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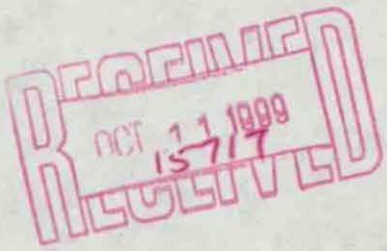
CEDAR CHEMICAL CORPORATION

RISK ASSESSMENT

WEST HELENA, ARKANSAS

EnSafe Project Number:
2162-012

Volume I – Sections 1-6



Prepared for:

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October 8, 1999

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List of Acronyms

ABS	absorption factor
AF	adherence factor
AT	averaging time
bgs	Below ground surface
BW	body weight
C_a	Concentration in air
C_w	Concentration in water
CCC	Cedar Chemical Corporation
CDI	chronic daily intake
CF	conversion factor
cm^2	square centimeters
COCs	Chemical of concern
COE	Corps of Engineers
COPC	Chemical of potential Concern
CR	contact rate
CRAVE	Carcinogen Risk Assessment Verification Endeavor
CT	central tendency
D	diffusion coefficient
dC/dt	change in VOC concentration over time
DI	daily intake
ECPC	Ecological Chemical of Potential Concern
ED	exposure duration
EF	exposure frequency
EPC	Exposure Point Concentration
ERA	Ecological risk assessment
ER-L	effects range-low
ET	exposure time
°F	degrees Fahrenheit
FOSL	Finding of Suitability to Lease
GI	gastrointestinal track
H_c	Henry's Law constant
HEAST	Health Effects Assessment Summary Tables
HHRA	Human health risk assessment
HI	Hazard Index

HQ	Hazard Quotient
hr	hour
IRIS	Integrated Risk Information System
kg	kilogram
LOAEL	lowest observed adverse effects level
L/day	liter per day
μg/kg	micrograms per kilogram
μg/L	micrograms per liter
mg/day	milligrams per day
mg/kg	milligram per kilogram
mg/L	milligrams per liter
mg/m^3	milligrams per cubic meter
m^3/day	cubic meters per day
MSSL	Medium-specific Screening Level
MTCA	Model Toxic Control Act
m^2/sec	meters per square inch
m	meter
mm	millimeters
moles/ft^2-lb	moles per square feet pound
N	number of samples
N_A	molar flux
N/A	not applicable
NOAEL	no observed adverse effects level
NPDES	National Pollution Discharge Elimination System
OSWER	USEPA Office of Solid Waste and Emergency Response
P	total pressure
p_A	partial pressure
$(p_b)_{lm}$	log mean of air pressure
ppb	parts per billion
ppm	parts per million
P_{vp}	air vapor pressure
PCBs	Polychlorinated biphenyls
PDE	potential dietary exposure
PEST	Pesticides
PQL	Practical Quantitation Limit
psi	pounds per square inch

R	ideal gas constant
RAGS	Risk Assessment Guidance for Superfund
RCRA	Resource Conservation and Reauthorization Act
RfC	Reference Concentration
RfD	Reference Dose
RFI	RCRA Facility Investigation
RME	reasonable maximum exposure
°R	degrees Rankine
SF	Slope Factor
SQB	Sediment Quality Benchmark
SQC	Sediment Quality Criteria
SQL	Sample Quantitation Limit
SSL	Soil screening level
SSV	Sediment Screening Value
SVOC	Semivolatile organic compounds
SWMU	Solid Waste Management Unit
T	temperature
UCL	Upper Confidence Limit
UFs	Uncertainty factors
UR	Unit Risk
USEPA	U.S. Environmental Protection Agency
VF	Volatilization factor
VOC	Volatile organic compounds

EXECUTIVE SUMMARY

Introduction

This report presents results of the baseline human health risk assessment (HHRA) and ecological risk assessment conducted for the Cedar Chemical Corporation (CCC) facility in West Helena, Arkansas. The objective of the site-specific risk assessment was to evaluate potential impacts to human health and the environment, if any, associated with chemicals that have been detected in soil, sediment, and groundwater at the site.

Most baseline risk assessments are divided into two parts — one addressing human health risk, and the other assessing ecological risk. Section 2.0 discusses human health risk at CCC. Ecological risk is discussed in Section 3.0.

I. Site History

CCC is an active chemical manufacturing facility in Phillips County, Arkansas, south of West Helena, Arkansas. The site consists of approximately 48 acres along State Highway 242, one mile southwest of the intersection of U.S. Highway 49 and Highway 242. Figure 1 presents a vicinity map for the site.

Prior to 1970, the CCC plant site was cultivated farmland. In 1970, Helena Chemical Company acquired the site to construct a Propanil manufacturing facility. In 1971, the newly constructed plant was sold to J.A. Williams, who in turn transferred the plant to Eagle River Chemical Corporation, a newly formed Arkansas corporation which was initially controlled by the Ansul Company. Under Ansul's management, the plant was converted to the production of dinitrobutylphenol, also known as dinoseb. In late 1972, Ansul sold its majority stock interest in Eagle River Chemical Corporation back to the corporation, leaving J.A. Williams as the sole shareholder. Eagle River Chemical Corporation was subsequently merged into Vertac Chemical Corporation. Vertac operated the plant until CCC acquired the site in 1986.

The facility consists of six production units and support facilities, an office on the north side of Industrial Park Road, and a biological treatment system south of the road. The entire CCC facility is fenced with controlled access. Active processes are conducted on approximately 20 acres. The rest of the site contains the biological treatment ponds and closed surface impoundments, or is unoccupied.

II. Risk Assessment Summary

For the HHRA, the CCC facility was evaluated based on the eight sites (Sites 1, 2, 3, 4, 5, 6, 8, and 9) that were defined during the RCRA Facility Investigation (RFI). The sites were grouped based on the exposure setting and chemicals detected.

The overall framework used in this HHRA is based on information presented in the Risk Assessment Work Plan (EnSafe, 1998). This document uses approved USEPA guidance provided in the documents outlined in Section 2.2.2 of the baseline risk assessment.

For this HHRA soil and sediment data were evaluated by site, while groundwater is evaluated separately as either perched groundwater or alluvial groundwater. The list of chemicals detected in site media selected for inclusion in the quantitative human health risk assessment was obtained by: (1) comparison of site-related data to risk-based screening levels and (2) comparison to site-related background concentrations, when available.

Chemicals of potential concern (COPCs) identified for soil and sediment at each of the eight sites are presented below.

Site	Surface Soil	Surface and Subsurface Soil	Sediment
Site 1	arsenic, dieldrin, 1,2-dichloroethane	arsenic, dieldrin, 1,2-dichloroethane	arsenic, chromium
Site 2	aldrin, dinoseb	arsenic, cadmium, mercury, aldrin, dieldrin, 1,2-dichloroethane, carbon tetrachloride, chloroform, methylene chloride	NA

Site	Surface Soil	Surface and Subsurface Soil	Sediment
Site 3	NA	dinoseb	arsenic, aldrin, dieldrin, toxaphene, pentachlorophenol
Site 4	dieldrin, dinoseb	arsenic, dieldrin, dinoseb, 3,4-dichloroaniline, 1,2-dichloroethane	NA
Site 5	N/A	arsenic, dinoseb	NA
Site 6	arsenic, aldrin, dieldrin, methoxychlor, toxaphene, dinoseb	NA	NA
Site 8	There were no COPCs identified.	NA	NA
Site 9	heptachlor, dinoseb, 3,4-dichloroaniline, Propanil	arsenic, dinoseb, 3,4-dichloroaniline, Propanil, 1,2-dichloroethane	NA

Note:
NA = No samples were collected.

COPCs identified for perched groundwater include: arsenic, lead, 4,4'-DDT, alpha-BHC, 1,4-dichlorobenzene, 2,6-dinitrotoluene, 4-chloroaniline, bis (2-chloroethyl) ether, 1,2-dichloroethane, 4-methyl-2-pentanone, acetone, benzene, chloroform, methylene chloride, and trichloroethene.

COPCs identified for alluvial groundwater include: 1,1,2-trichloroethane, 1,2-dichlorobenzene, 1,2-dichloroethane, 1,2-dichloropropane, benzene, bromodichloromethane, chlorobenzene, chloroform, dibromochloromethane, methylene chloride, and vinyl acetate.

Risk was evaluated for the following receptors and exposure pathways using guidance provided in *Risk Assessment Guidance for Superfund Volume I: Human Health Evaluation Manual* (RAGS Part A) (USEPA, 1989).

Potentially Exposed Population	Medium	Exposure Pathway
Current Land Uses		
Site Workers	Air	Inhalation of gaseous contaminants released from soil
	Air	Inhalation of chemicals entrained in fugitive dust
	Surface Soil	Incidental ingestion
	Surface Soil	Dermal contact
Future Land Uses		
Site Workers	Air	Inhalation of gaseous contaminants released from soil
	Air	Inhalation of chemicals entrained in fugitive dust
	Surface Soil	Incidental ingestion
	Surface Soil	Dermal contact
Future Onsite Construction Workers	Air	Inhalation of gaseous contaminants released from soil
	Air	Inhalation of chemicals entrained in fugitive dust
	Surface and Subsurface Soil	Incidental ingestion
	Surface and Subsurface Soil	Dermal contact
	Sediment	Incidental ingestion
	Sediment	Dermal contact
	Perched Groundwater	Incidental ingestion
	Perched Groundwater	Dermal contact
Future Offsite Agricultural Workers	Air	Inhalation of gaseous contaminants released from alluvial groundwater
Future Site Trespassers (Adolescents, 7 through 16 years old)	Air	Inhalation of gaseous contaminants released from soil
	Air	Inhalation of chemicals entrained in fugitive dust
	Surface Soil	Incidental ingestion
	Surface Soil	Dermal contact
	Sediment	Incidental ingestion
	Sediment	Dermal contact

Results of Risk Characterization

With the exception of alluvial groundwater exposure for the offsite agricultural worker, and the Site 2 adult worker exposure to arsenic (3E-04) in surface soil, risk for all of the scenarios investigated for perched groundwater, sediment and soil exposures have cumulative cancer risks for all pathways is less than 1E-04.

Groundwater carcinogenic risk for alluvial groundwater is 5E-01. Because of the magnitude of risk, risk was calculated using the one-hit equation [i.e., $Risk = 1 - \exp(-CDI \times SF)$] as presented in RAGS Part A. The primary contributor to carcinogenic risk for alluvial groundwater is 1,2-dichloroethane. Methylene chloride (2E-03), chloroform (2E-04), and benzene (8E-04) were also above the 1E-04 threshold.

Hazard quotients (HQs) for several sites exceed unity (i.e., greater than 1), suggesting that COPCs may pose adverse noncarcinogenic impact to receptors evaluated in the HHRA. The construction worker soil exposures exceed unity at sites 2, 3, 4, and 9. The primary contributor to the soil HQ is dinoseb at sites 3, 4, and 9 and 1,2-dichloroethane at Site 2. 4-Chloroaniline, 1,2-dichloroethane, and methylene chloride are the primary contributors to HQ for perched groundwater.

Noncarcinogenic risks exceed unity (i.e., greater than 1) for the adult worker exposed to dinoseb in surface soil at site 9.

Noncarcinogenic risks with an HQ greater than 1 for the trespasser include dinoseb and propanil at Site 9.

Noncarcinogenic risks exceeding unity for the offsite agricultural worker exposure to airborne volatile organic compounds (VOCs) released from alluvial groundwater include: benzene, chlorobenzene, methylene chloride, and 1,2-dichloroethane, and 1,2-dichloropropane.

Chemicals of Concern Identified by Site and Media

A contaminant was selected as a chemical of concern (COC) if its cancer risk (CR) exceeded 1E-6 or had an HQ greater than 1. For CCC sites the COCs are listed below by site and media:

Site	Surface Soil	Subsurface Soil	Sediment
1	None	None	Arsenic
2	None	1,2-Dichloroethane	N/A
3	N/A	Dinoseb	None
4	Dinoseb	3,4-Dichloroaniline, Dinoseb	N/A
5	N/A	Dinoseb	N/A
6	None	NA	N/A
9	Dinoseb, Propanil	3,4-Dichloroaniline, Dinoseb, Propanil	N/A
Perched Groundwater		4-Chloroaniline, 1,2-Dichloroethane, Methylene chloride	
Alluvial Groundwater		Benzene, Chloroform, Methylene Chloride, 1,2-Dichloroethane, 1,2-Dichloropropane, and Chlorobenzene	

Note:
N/A = Not applicable.

Results of Central Tendency Evaluation

Where reasonable maximum exposure (RME) estimates of risk indicated a significant threat (an CR greater than 1E-4 or an HQ greater than 1) would be posed to human health, central tendency (CT) analysis was performed. The CT analysis uses the arithmetic mean concentration as the EPC and 50th percentile exposure assumptions which are consistent with guidance provided in *Exposure Factor's Handbook* (USEPA, 1997). Central tendency exposures are presented for comparison to risks associated with RME exposure.

A CT evaluation was completed for the following sites, media, and chemicals.

Receptor	Site	Media	Chemicals
Construction Worker	1 & 2	Perched Groundwater	4-Chloroaniline, 1,2-Dichloroethane, Methylene chloride
	3	Surface and Subsurface Soil	Dinoseb
	4	Surface and Subsurface Soil	3,4-Dichloroaniline, Dinoseb
	5	Surface and Subsurface Soil	Dinoseb
	9	Surface and Subsurface Soil	3,4-Dichloroaniline, Dinoseb, Propanil
Adult Worker	9	Surface Soil	Dinoseb, Propanil
Trespasser	9	Surface Soil	Dinoseb, Propanil
Offsite Agricultural Worker	—	Alluvial Groundwater	Benzene, Chloroform, Methylene chloride, 1,2-Dichloroethane, 1,2-Dichloropropane

Construction Worker

Noncarcinogenic risks calculated using CT exposure assumptions for the construction worker exposed to surface and subsurface soil are less than 1 at Sites 2, 3, 4, 9, and in perched groundwater.

Adult Worker

Using CT exposure assumptions noncarcinogenic risks for dinoseb at Site 9 remain above 1. There were no chemical exhibiting carcinogenic effects exceeding the 1E-04 threshold for this receptor.

Trespasser

Using CT exposure assumptions noncarcinogenic risks are less than 1. There were no chemicals exhibiting carcinogenic effects exceeding the 1E-04 threshold for this receptor.

Offsite Agricultural Worker

Noncarcinogenic risks estimated for the offsite agricultural worker exposed to VOCs released from alluvial groundwater using CT exposure assumptions remain substantially greater than 1. 1,2-Dichloroethane (1511), chlorobenzene (4), 1,2-dichloropropane (6), and benzene (8) are the

primary contributors to noncarcinogenic risk. Additionally, carcinogenic risk remains above 1E-4. 1,2-Dichloroethane (1E-02), methylene chloride (5E-4) and benzene (2E-4) are the primary contributors to carcinogenic risk. Because of the maginitude of risk associated with exposures to 1,2-dichloroethane, risk was calculated using the one-hit equation as presented in RAGS Part A.

Conclusions

Alluvial groundwater risks based on RME and CT exposure assumptions for the offsite agricultural worker represent the most substantial carcinogenic risks to human receptors contacting contaminated media associated with CCC. Noncarcinogenic risk based on RME for all receptors are substantially high based primarily on construction worker exposures to dinoseb in surface and subsurface soil at Sites 3, 4, and 9.

For ecological receptors potential risk in Area I is considered acceptable because these ditches are integral components of the facility's waste water treatment system. Because of the function of these ditches, standing water is frequently drained and any aquatic habitat is considered opportunistic. The isolated wetland in Area II is not considered at risk because the exposure pathway is incomplete. Risk to receptors in Area III from exposure to contaminated alluvial groundwater from irrigation farm practices is considered minimal based on the lack of receptors and the high volatility of 1,2-dichloroethane.

Remedial Goal Options

Remedial goal options (RGOs) are site-specific chemical concentrations used by risk managers during the development of remedial alternatives and are calculated to equate with specific target carcinogenic and noncarcinogenic risk levels. For CCC, RGOs were calculated for chemicals having an incremental lifetime cancer risk (ILCR) greater than 1E-6 or an HQ greater than 1. In accordance with USEPA Region 4 Supplemental Guidance (USEPA, 1995a), RGOs were calculated at 1E-6, 1E-5, and 1E-4 risk levels for carcinogenic COCs and HQ levels of 0.1, 1.0, and 3.0 for noncarcinogenic COCs for all applicable media. Inclusion in the RGO table does not necessarily indicate that remedial action will be required to address a specific chemical. Instead, RGOs are provided to facilitate risk-management decisions. RGOs for these chemicals are provided in the Tables 94 - 101.

1.0 INTRODUCTION

This report presents results of the baseline human health risk assessment (HHRA) and ecological risk assessment conducted for the Cedar Chemical Corporation (CCC) facility in West Helena, Arkansas. The objective of the site-specific risk assessment was to evaluate potential impacts to human health and the environment, if any, associated with chemicals that have been detected in soil, sediment, and groundwater at the site.

Existing site-specific information and sampling results presented in the following reports have been used in performing this risk assessment:

- Interim Response Work Plan, Cedar Chemical Corporation, West Helena, Arkansas. Prepared by Environmental Safety and Designs, Inc. April 10, 1995 (EnSafe, 1995b).

- Facility Investigation Cedar Chemical Corporation — FINAL. Prepared by Environmental and Safety Designs, Inc. June 28, 1996 (EnSafe, 1996).

- Risk Assessment Work Plan, Cedar Chemical Corporation. (EnSafe, 1998).

- Laboratory results analyzed by Paradigm Analytical Laboratories, Inc. September 1995, October 1995, November 1995, January 1996, April 1996, November 1996, March 1997, July 1997, and August 1997.

- Laboratory results analyzed by IT Corporation. September 1993.

- Laboratory results analyzed by American Interplex November 1994, December 1994, and January 1995.

- Biomonitoring results for Cedar Chemical Corporation by American Interplex calendar year 1998 and 1999.

For ease of use, all tables generated for calculation of risk and development of remedial goal options (RGOs) (i.e., Tables 1 through 100) are presented in Appendix A.

1.1 Site Characteristics

1.1.1 Site Condition

CCC is an active chemical manufacturing facility in Phillips County, Arkansas, just south of West Helena, Arkansas. The site consists of approximately 48 acres along State Highway 242, one mile southwest of the intersection of U.S. Highway 49 and Highway 242. Figure 1 presents a vicinity map for the site.

The facility consists of six production units and support facilities, an office on the north side of Industrial Park Road, and a biological treatment system south of the road. The entire CCC facility is fenced with controlled access. Active processes are conducted on approximately 20 acres. The rest of the site contains the biological treatment ponds and closed surface impoundments, or is unoccupied.

1.1.2 Site History

Prior to 1970, the CCC plant site was cultivated farmland. In 1970, Helena Chemical Company acquired the site to construct a Propanil manufacturing facility. In 1971, the newly constructed plant was sold to J.A. Williams, who in turn transferred the plant to Eagle River Chemical Corporation, a newly formed Arkansas corporation which was initially controlled by the Ansul Company. Under Ansul's management, the plant was converted to the production of dinitrobutylphenol, also known as dinoseb. In late 1972, Ansul sold its majority stock interest in

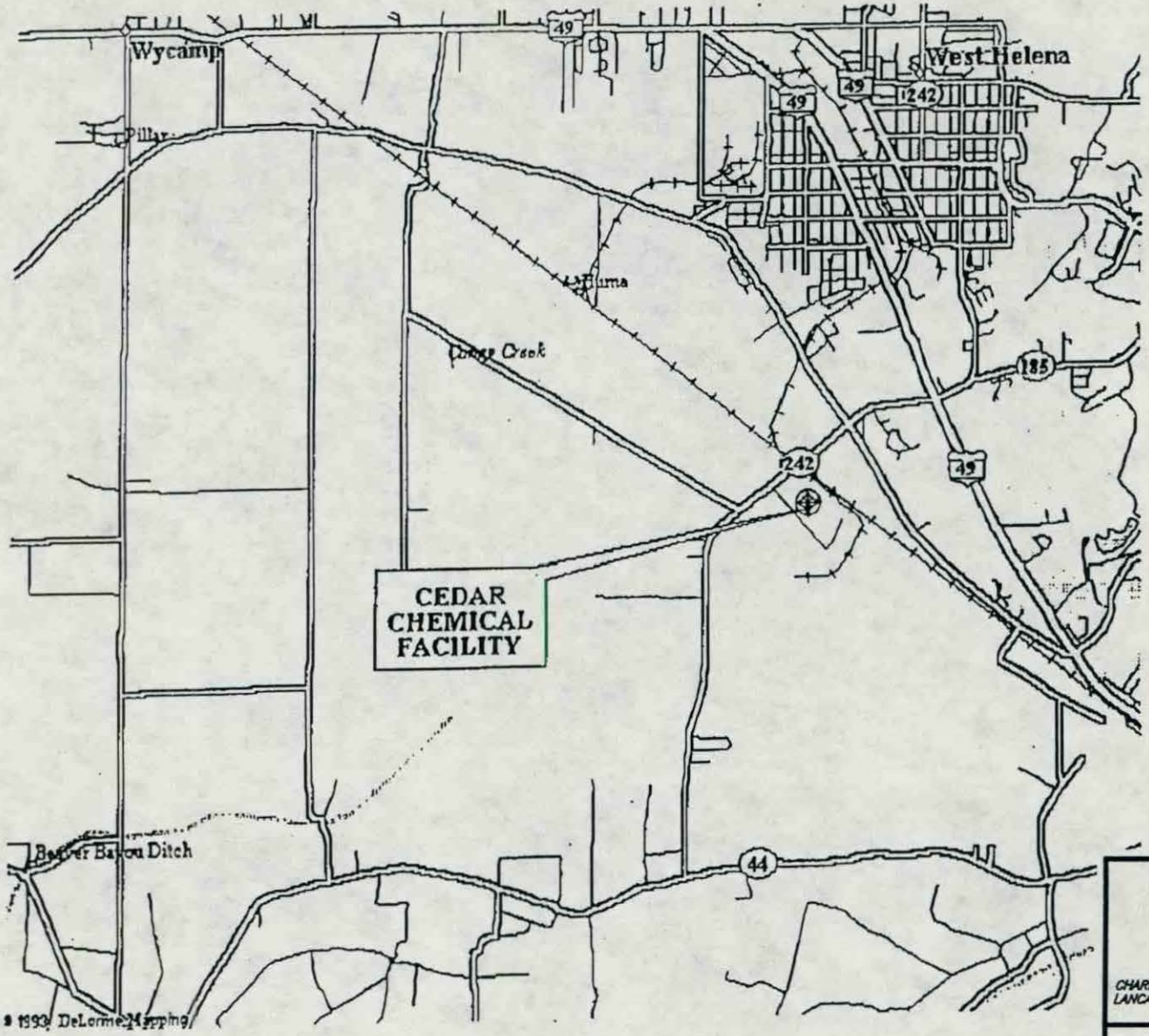

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FIGURE 1
VICINITY MAP
CEDAR CHEMICAL
RISK ASSESSMENT

DWG DATE: 08/05/99	DWG NAME: BOARD

Eagle River Chemical Corporation back to the corporation, leaving J.A. Williams as the sole shareholder. Eagle River Chemical Corporation was subsequently merged into Vertac Chemical Corporation. Vertac operated the plant until CCC acquired the site in 1986.

Solid wastes generated during the period before Vertac's operation are largely unknown. It should be noted that formulation processes vary because of the contract nature of the agricultural chemical business. However, the manufacturing segment is routine and not subject to substantial variation.

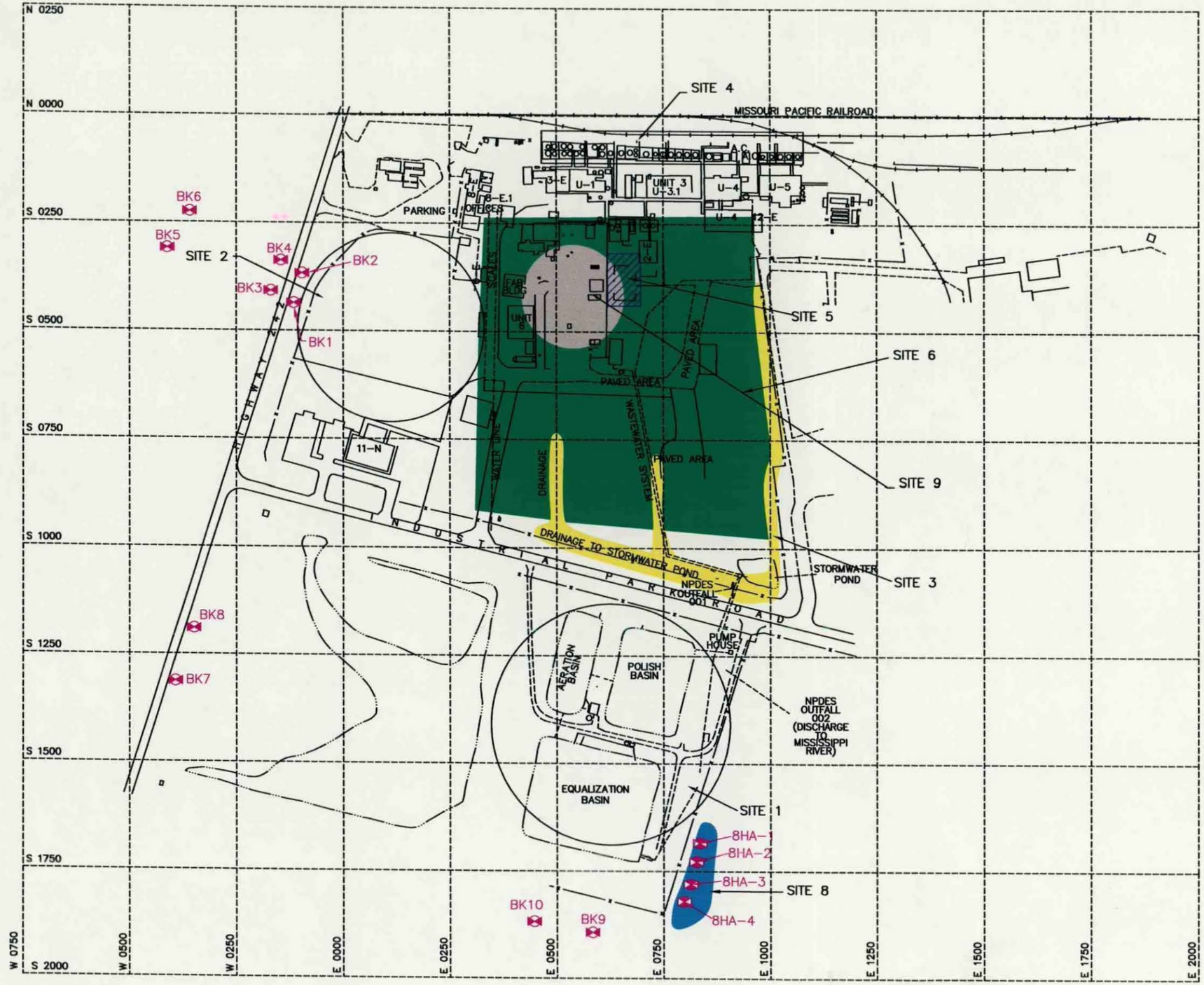
1.1.3 Present Site Operations

CCC, which employs approximately 125 people, manufactures various agricultural chemicals including insecticides, herbicides, polymers, and organic intermediates. Plant processes are batch operations with seasonal production fluctuations and constant product introductions. CCC manufactures its own products (such as Propanil, a rice herbicide) and also custom manufactures chemicals for contract clients. Formulation and packaging are ancillary activities, and are conducted only when the product is ready for the consumer market.

The facility consists of 6 production units. Unit 1 formulates various custom agricultural products for other companies. Unit 2 is the Propanil production unit. Unit 3 was destroyed in a fire and explosion on September 26, 1989. Unit 4 produces various custom products. Unit 5 primarily manufactures nitroparaffin derivatives. In 1991, Unit 6 began producing dichloroaniline, which is used in the production of Propanil. Figure 2 presents a facility map.

2.0 HUMAN HEALTH RISK ASSESSMENT

Most baseline risk assessments are divided into two parts — one addressing human health risk, and the other assessing ecological risk. This section assesses human health risk at CCC. Ecological risk is assessed in Section 3.0. Methods used to reach the conclusions of this HHRA are discussed in the following sections.



LEGEND

- WATER OR DRAINAGE
- ROAD
- TRAIL
- SIDEWALK
- RAILROAD
- BUILDING
- FENCE
- SUBSURFACE PIPING (APPROX..)
- BACKGROUND SAMPLE

250 0 250

SCALE FEET

MAP SOURCE: DELTA PROCESS MANAGEMENT, INC.

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FIGURE 2
SITE MAP
CEDAR CHEMICAL
RISK ASSESSMENT

DWG DATE: 10/01/99 | DWG NAME: 2162B002

2.1 Areas of Concern

For the HHRA, the CCC facility will be evaluated based on the eight sites that were defined during the RCRA Facility Investigation (RFI). The sites were grouped based on the exposure setting and chemicals detected. A brief description of each site and its use is described below.

Site 1

Site 1, presented in Figure 3, comprises four Solid Waste Management Units (SWMUs): Wastewater Tank 2 (SWMU 63), the Flow Equalization Basin (SWMU 64), the Aeration Basin (SWMU 65), and the Polish Pond (SWMU 68), that are part of the wastewater treatment system. The treatment system is in the southeast corner of the site across Industrial Park Road. Perched groundwater was encountered at approximately 12 feet bgs.

Site 2

SWMUs 69, 70, and 71 (Figure 4) are part of a three-pond wastewater treatment system used from 1970 to 1978. In 1978 the ponds were drained by a disposal contractor and filled with soil from the CCC property. Ponds 1 and 2 were approximately 120 feet × 150 feet × 10 feet deep and Pond 3 was approximately 30 feet × 150 feet × 4 feet deep. The units were constructed of earthen fill and were not lined. Pond 3 also contained limestone for acid neutralization. The units received wastes from onsite production processes and some wastes generated offsite until 1978, including propionic acid, calcium chloride solution, and neutralized sulfuric acid waste. This list does not include the wastes disposed at this site by Helena Chemical Company. Helena formulated between 100 to 200 compounds, any of which could have been disposed of in these ponds. Currently Site 2 has gravel, sparse vegetation, and dirt as ground cover. Perched groundwater was encountered approximately 12 feet beneath this site.

Site 3

Site 3, presented as Figure 5, includes two SWMUs which constitute the storm water drainage system for the facility. All storm water runoff at the facility is collected in four storm water

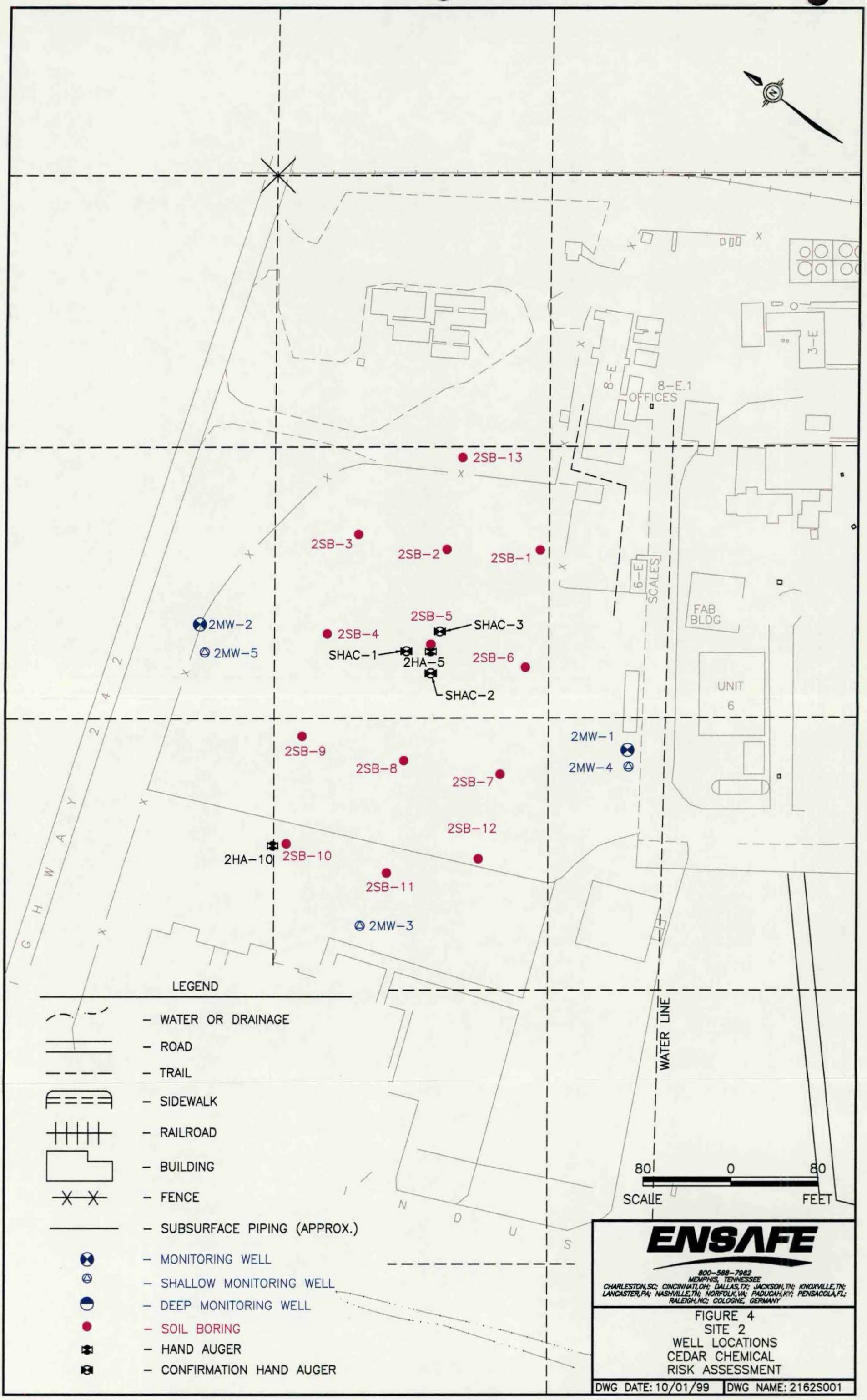

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FIGURE 4
SITE 2
WELL LOCATIONS
CEDAR CHEMICAL
RISK ASSESSMENT

DWG DATE: 10/01/99 | DWG NAME: 2162S001

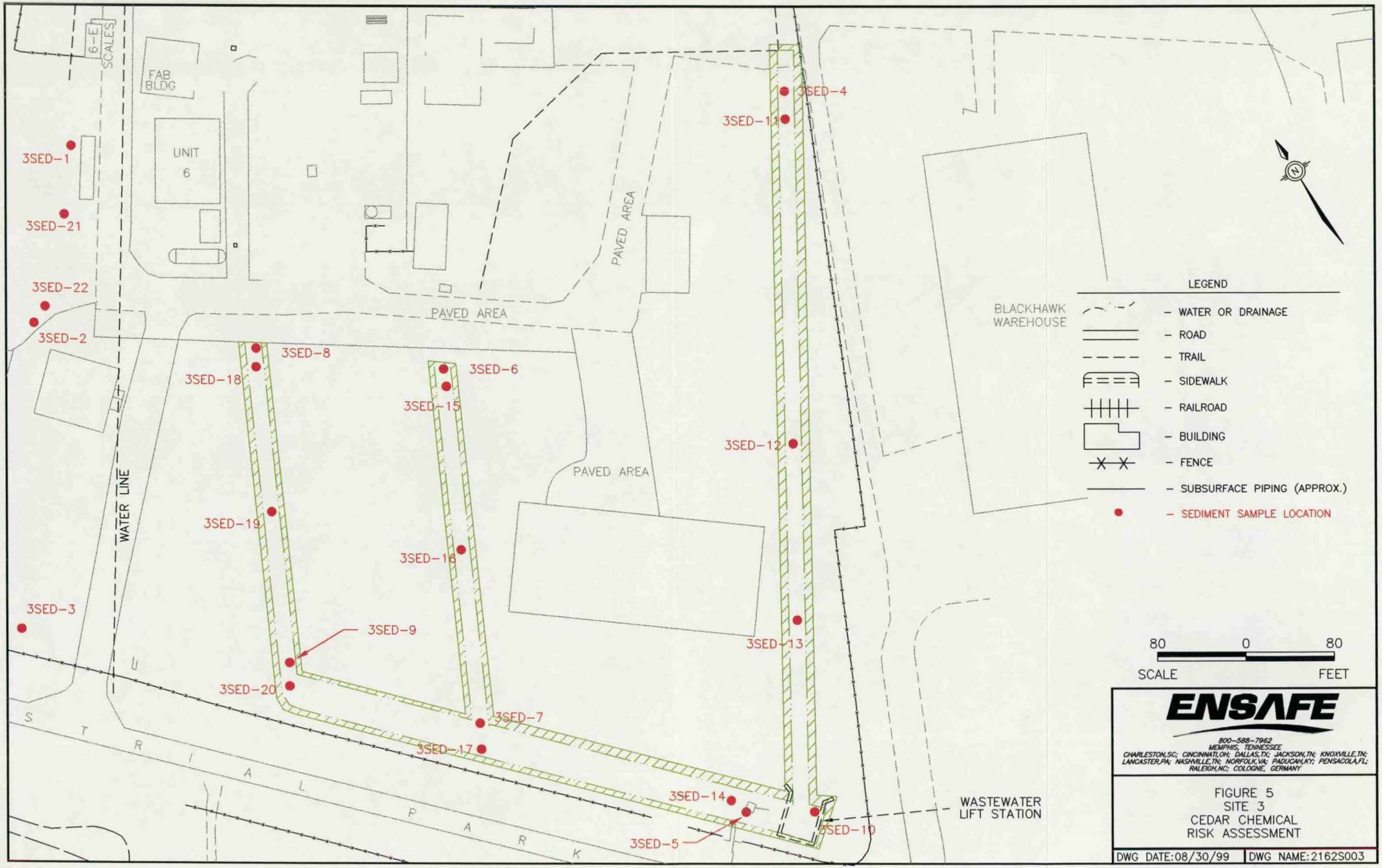

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FIGURE 5
SITE 3
CEDAR CHEMICAL
RISK ASSESSMENT

DWG DATE:08/30/99 | DWG NAME:2162S003

INDUSTRIAL PARK ROAD

WASTEWATER LIFT STATION

1GB-1

LB-2

1MW-1

1MW-7

LB-4

PUMP HOUSE

AREA II WETLAND

AERATION BASIN

POLISH BASIN

1GB-2

1HA-6
1HA-5
1HA-4
1HA-7

1MW-5

LB-3

1MW-2

EQUALIZATION BASIN

API SEPARATOR

8HA-1
8HA-2
8HA-3
8HA-4
1MW-4
1MW-6
1HA-3
1HA-2
1HA-1

1MW-3

1GB-3

1GB-4

W 0500
W 0250
E 0000
E 0250
E 0500
E 0750
E 1000

LEGEND

- WATER OR DRAINAGE
- ROAD
- TRAIL
- SIDEWALK
- RAILROAD
- BUILDING
- FENCE
- SUBSURFACE PIPING (APPROX.)
- MONITORING WELL
- SHALLOW MONITORING WELL
- DEEP MONITORING WELL
- SOIL BORING
- GEOPROBE BORINGS
- HAND AUGER

125 0 125

SCALE FEET

MAP SOURCE: DELTA PROCESS MANAGEMENT, INC.

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FIGURE 3
SITE 1
CEDAR CHEMICAL
RISK ASSESSMENT

DWG DATE:08/30/99 | DWG NAME:2162S002

ditches (SWMU 59) which flow through the interior of the property to the southwest. These ditches all drain into a larger storm water ditch adjacent to Industrial Park Road. This ditch flows south into the storm water sump (SWMU 60), formerly the storm water pond. The contents of the sump are periodically pumped into the wastewater treatment system directly across Industrial Park Road.

Site 4

Site 4, presented as Figure 6, includes two SWMUs, the railroad loading/unloading area (SWMU 74) and an abandoned railroad loading and unloading sump (SWMU 3). Both SWMUs are in an area between the railroad spur and the main tank farm where raw materials and final products are transferred between the tank farm and railroad cars. Staining in this area indicated that releases may have occurred during past transfer operations. Currently this site has gravel and sparse vegetation as ground cover.

Site 5

This unit is a concrete vault with walls of poured concrete, a sub-floor of gravel, sand, and possibly cement, and a concrete cap which forms the floor of the warehouse onsite. In addition to fill sand and gravel, the vault contains approximately 250 drums of solidified, low-grade herbicide which did not meet product specifications. It is believed that the drums were placed in the vault in early 1976. Site 5 is presented as Figure 7.

Site 6

Site 6 (Figure 8) includes several areas of the plant where yellow staining is visible, particularly after rain, indicating the presence of Dinoseb. The staining appears to be dispersed across the nonproduction area of Site 6 with some areas more heavily stained than others.

MISSOURI PACIFIC RAILROAD

4HA-6 4HA-5 4HA-4 4HA-3 4HA-2 4HA-1

4SB-3 4SB-2 4SB-1

4HA-9 4HA-10 4HA-8 4HA-7

SAI-27 SAI-23 PZ-5

4MW-1 SAI-9 SAI-10 SAI-11 SAI-12 SAI-13 SAI-14

UNIT 3 4MW-2 U-4 U-5

4GB-3

SAI-6 SAI-5 SAI-17 SAI-15

SAI-7 U-4

SAI-8 4MW-3

SAI-4 SAI-1 SAI-18 SAI-16 SAI-28

SAI-21 SAI-24 SAI-25

9GB-21 SAI-3 SAI-2

SAI-20 SAI-19 SAI-26 4GB-4

SAI-22

PAVED AREA

PAVED AREA

BLACKHAWK WAREHOUSE

WASTEWATER LIFT STATION

ROAD

LEGEND

- WATER OR DRAINAGE
- ROAD
- TRAIL
- SIDEWALK
- RAILROAD
- BUILDING
- FENCE
- SUBSURFACE PIPING (APPROX.)
- MONITORING WELL
- SHALLOW MONITORING WELL
- DEEP MONITORING WELL
- SOIL BORING
- GEOPROBE BORINGS
- HAND AUGER

4MW-4

80 0 80

SCALE FEET

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FIGURE 6
SITE 4
CEDAR CHEMICAL
RISK ASSESSMENT

DWG DATE: 08/30/99 | DWG NAME: 2162S005

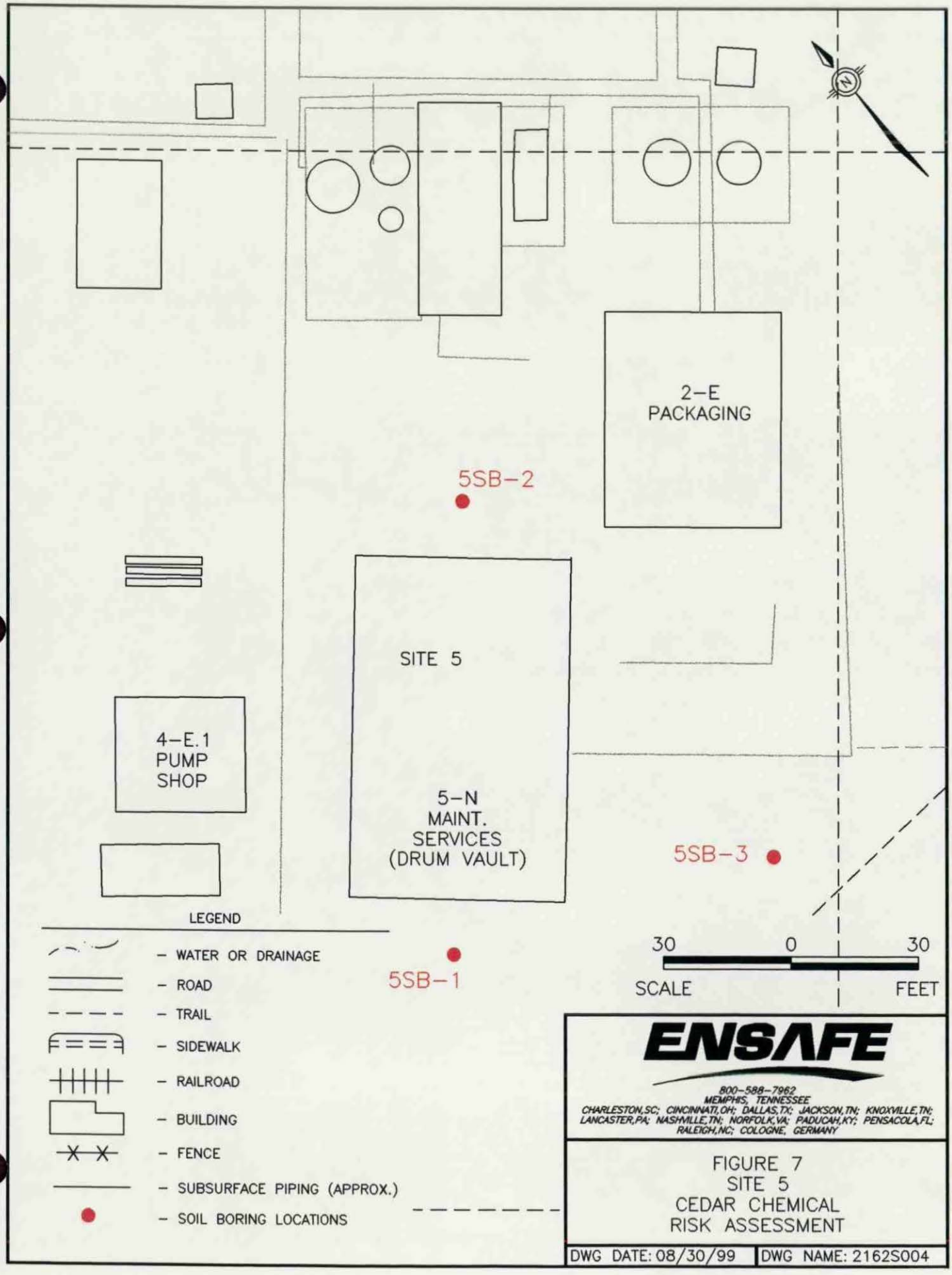

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FIGURE 7
SITE 5
CEDAR CHEMICAL
RISK ASSESSMENT

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FIGURE 8
SITE 6
CEDAR CHEMICAL
RISK ASSESSMENT

DWG DATE: 08/30/99 | DWG NAME: 2162S006

Site 8

Site 8 (Figure 9) is a ditch on the south side of the wastewater treatment ponds. In the past the API Separator would overflow and wastewater destined for the treatment ponds into the industrial park ditch to the White River. To remediate this problem, the separator and pad were cleaned and a gutter was installed in February 1992. The gutter was designed to divert all overflow into the equalization pond. The contaminated soil in the ditch was also removed, placed in drums, and sent to the Chemical Waste Management Subtitle C landfill in Carlyss, Louisiana; however, no confirmatory sampling of the ditch was performed. All storm water is currently discharged to NPDES Outfall No. 002 via the treatment ponds.

Site 9

Site 9 (Figure 10) consists of three suspected abandoned ponds in the area between the dichloroaniline unit and the maintenance services building (Site 5). The ponds were reportedly shallow, unlined basins used to dispose of off-specification dinoseb. The ponds are no longer used and have since been backfilled. Buildings have been constructed in the vicinity of the ponds and some areas have been paved or covered with gravel.

2.2 Data Collection and Evaluation

This section summarizes analytical data collected for the site, identifies chemicals of potential concern (COPCs), and determines chemical-specific concentrations to be used in the risk assessment.

2.2.1 Historical Data Evaluation

This section presents a summary of results of investigations that have been conducted for CCC. There were several sampling investigations completed for the CCC property. During these investigations, groundwater, sediment, and soil were sampled for Resource Conservation and Recovery Act (RCRA) metals, pesticides (PESTs), and polychlorinated biphenyls (PCBs), semivolatile organic compounds (SVOCs), and volatile organic compounds (VOCs). However,

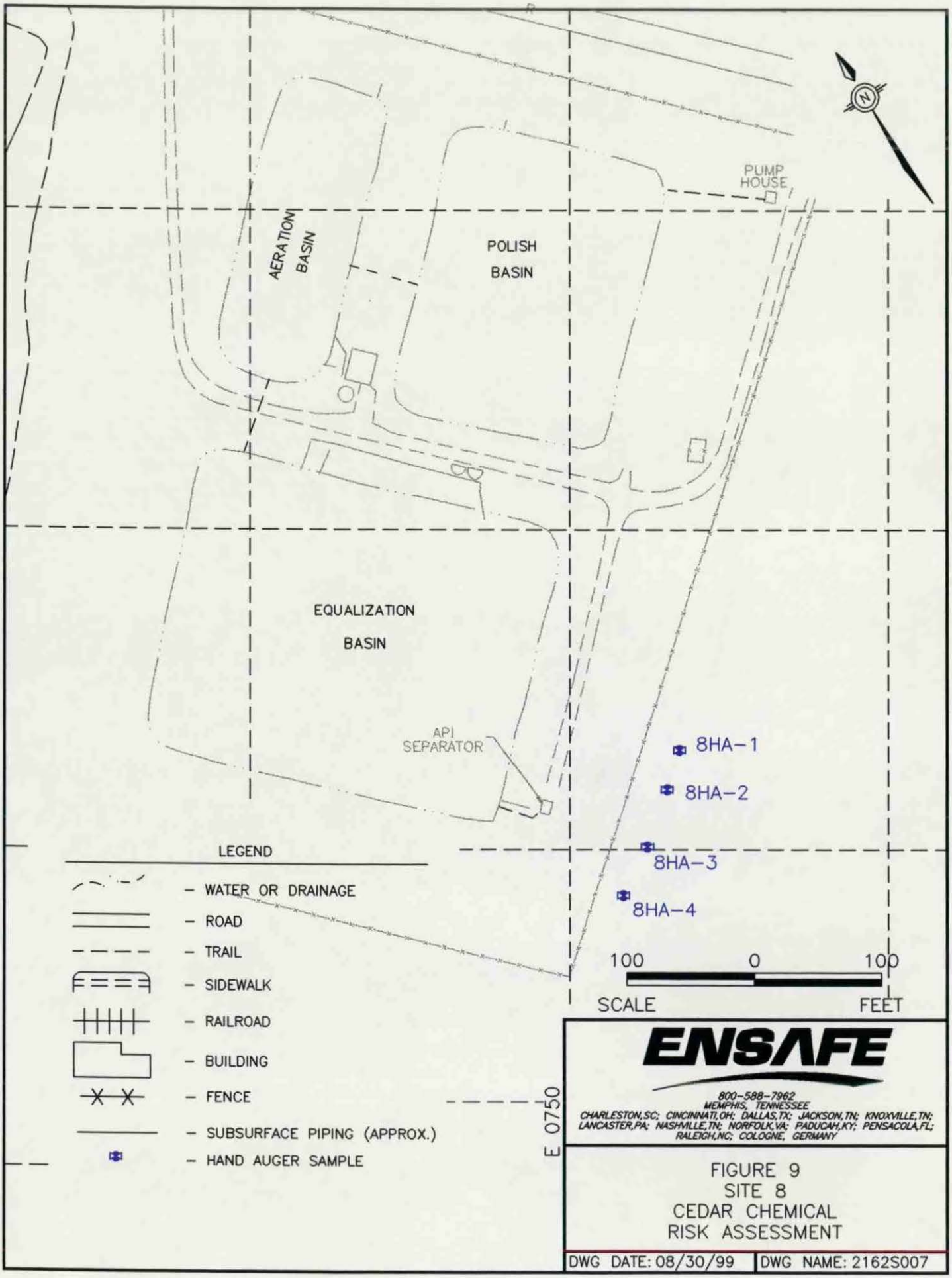

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FIGURE 9
SITE 8
CEDAR CHEMICAL
RISK ASSESSMENT

DWG DATE: 08/30/99 | DWG NAME: 2162S007

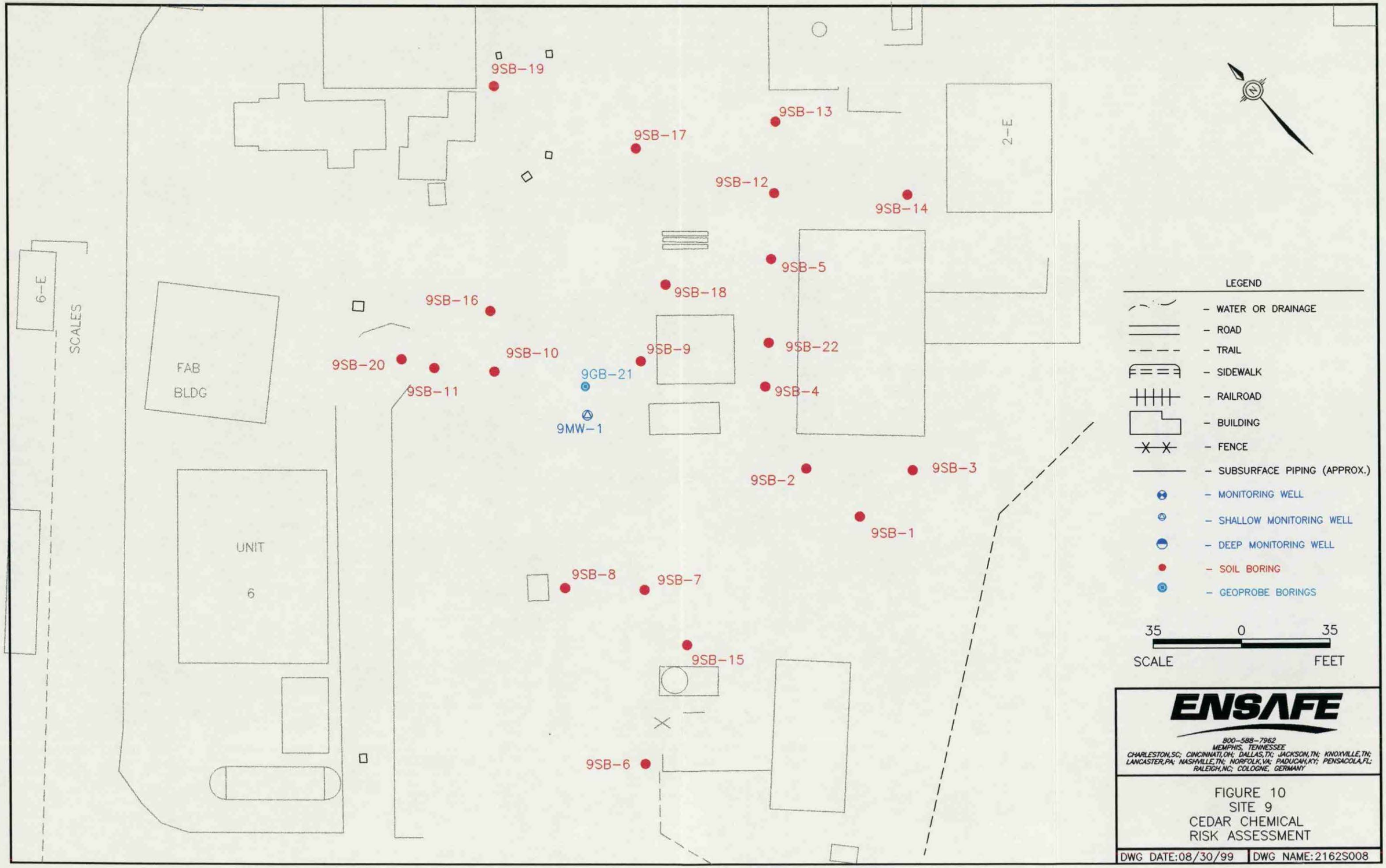

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FIGURE 10
SITE 9
CEDAR CHEMICAL
RISK ASSESSMENT

DWG DATE:08/30/99 | DWG NAME:2162S008

not all parameters were analyzed for each sampling investigation. Specific details regarding sampling events and parameters analyzed used to develop this HHRA are presented in the RCRA Facility Investigation (EnSafe, 1996). Additional surface soil samples were collected at Site 2 to determine if the arsenic detection of 98.1 ppm was an anomaly. Three samples were collected approximately 10 to 40 feet from soil boring 2SB-5 (Figure 4). The analytical data from these locations were considered discrete samples for screening. Because the additional samples did not confirm the original hit of 98.1 ppm, the high detection was considered an anomaly and not used for screening or calculating the concentration used to quantitate risk.

All analytical data used in this baseline risk assessment is presented in Appendix B.

2.2.2 Scope of Work for Risk Assessment

The overall framework used in this HHRA is based on information presented in the Risk Assessment Work Plan (EnSafe, 1998). This document uses approved USEPA guidance provided in the following documents:

- *Risk Assessment Guidance for Superfund (RAGS), Volume I — Human Health Evaluation Manual (Part A)*, (RAGS Part A)(United States Environmental Protection Agency [USEPA], 1989).

- *RAGS, Volume I — Human Health Evaluation Manual, Supplemental Guidance — Standard Default Exposure Factors — Interim Final,* (USEPA, 1991).

- *RAGS, Volume I — Human Health Evaluation Manual, Supplemental Guidance — Dermal Risk Assessment — Interim Guidance*, (Supplemental Dermal Guidance)(USEPA, 1992a).

- *Supplemental Guidance to RAGS: Calculating the Concentration Term* (USEPA, 1992b).

- *Supplemental Guidance to RAGS: Region 4 Bulletins*, (USEPA Region 4, 1995a).

- *Screening Method for Estimating Inhalation Exposure to Volatile Chemicals from Domestic Water*. (USEPA, 1995b).

- *Exposure Factors Handbook* (USEPA, 1997a).

- *USEPA Region 6 Human Health Medium-Specific Screening Levels,* (MSSLs) (USEPA Region 6, October 1998).

- *Guidance on Preliminary Risk Evaluations (PREs) for the Purpose of Reaching a Finding of Suitability to Lease* (USEPA, 1994).

2.2.3 Identification of Chemicals of Potential Concern

Analytical results for all media are summarized in the RFI (EnSafe, 1996) for groundwater, sediment, and soil. The following discussion briefly reviews criteria used to identify COPCs for CCC.

For this HHRA soil and sediment data were evaluated by site, while groundwater is evaluated separately as either perched groundwater and alluvial groundwater. The list of chemicals detected in site media was reduced by: (1) comparison of site-related data to risk-based screening levels and (2) comparison to site-related background concentrations, when available. These comparisons are briefly discussed in the sections below.

2.2.3.1 Comparison of Data to Risk-based Screening Values

The maximum detected concentrations were compared to MSSLs provided in USEPA Region 6 Human Health Media-Specific Screening Levels (October 1998). As stated in the USEPA

Region 6 document, MSSLs were derived based on a risk goal of 1E-06 for carcinogenic effects and a hazard quotient (HQ) of 1 for noncarcinogenic effects . For the purposes of this HHRA, screening values for the noncarcinogenic chemicals were adjusted to an HQ of 0.1, which is more conservative than screening values in the USEPA Region 6 document. (USEPA, 1998).

USEPA Region 6 does not provide industrial tap water screening values, but USEPA Region 4 Guidance provides a method for converting residential tap water risk-based concentrations (RBCs) to industrial RBCs (USEPA, 1994). Using this method, residential RBCs for VOCs are divided by 0.25 and all other chemicals are divided by 0.5. RBCs were converted and presented in tabular form in accordance with RAGS (USEPA 1994c, USEPA 1995b). Chemicals reported in perched groundwater were excluded from the HHRA if the reported maximum concentrations are less than the RBCs. Because alluvial groundwater exposures are based on the inhalation pathway, risk-based ambient air concentrations that have been derived by Region 6 were used to screen modeled VOC concentrations volatilized from alluvial groundwater (USEPA, 1998).

Reported maximum surface soil [0 to 1 foot below ground surface (bgs)] and sediment concentrations were compared to residential MSSLs based on ingestion. For the industrial scenario, maximum reported surface and subsurface soil (all depths) concentrations were compared to industrial MSSLs based on ingestion. When necessary, chemicals that did not have a published MSSL were compared to a surrogate MSSL. Surrogate compounds were selected based on structural, chemical, or toxicological similarities and are indicated on each screening table.

2.2.3.2 Comparison of Data to Background Concentrations

Limited background surface soil samples were collected for CCC. There were no background samples collected for subsurface soil and groundwater. With the exception of arsenic, background surface soil concentrations were determined for inorganics using results from three background

sampling locations. The background concentration for inorganic chemicals other than arsenic were established as the mean plus two standard deviations. Table 1 presents background data.

Because additional surface soil samples were collected for assessing background concentrations of arsenic, an upper confidence limit of the arithmetic mean (95th UCL) was calculated using guidance provided by USEPA (USEPA, 1992b). Background sampling locations are presented in Figure 2. Detailed UCL calculations are presented in Appendix C.

After comparison to risk-based screening values, detected metals concentrations were compared to site-specific background concentrations. Only those metals exceeding the MSSL and background concentrations were retained as COPCs.

2.2.3.3 Chemicals of Potential Concern

COPCs identified for soil and sediment at each of the eight sites are presented below.

Site	Surface Soil	Surface and Subsurface Soil	Sediment
Site 1	arsenic, dieldrin, 1,2-dichloroethane	arsenic, dieldrin, 1,2-dichloroethane	arsenic, chromium
Site 2	aldrin, dinoseb	arsenic, cadmium, mercury, aldrin, dieldrin, 1,2-dichloroethane, carbon tetrachloride, chloroform, methylene chloride	NA
Site 3	NA	dinoseb	arsenic, aldrin, dieldrin, toxaphene, pentachlorophenol
Site 4	dieldrin, dinoseb	arsenic, dieldrin, dinoseb, 3,4-dichloroaniline, 1,2-dichloroethane	NA
Site 5	N/A	arsenic, dinoseb	NA
Site 6	arsenic, aldrin, dieldrin, methoxychlor, toxaphene, dinoseb	NA	NA

Site	Surface Soil	Surface and Subsurface Soil	Sediment
Site 8	There were no COPCs identified.	NA	NA
Site 9	heptachlor, dinoseb, 3,4-dichloroaniline, Propanil	arsenic, dinoseb, 3,4-dichloroaniline, Propanil, 1,2-dichloroethane	NA

Note:
NA = No samples were collected.

COPCs identified for perched groundwater include: arsenic, lead, 4,4'-DDT, alpha-BHC, 1,4-dichlorobenzene, 2,6-dinitrotoluene, 4-chloroaniline, bis(2-chloroethyl)ether, 1,2-dichloroethane, 4-methyl-2-pentanone, acetone, benzene, chloroform, methylene chloride, and trichloroethene.

COPCs identified for alluvial groundwater include: 1,1,2-trichloroethane, 1,2-dichlorobenzene, 1,2-dichloroethane, 1,2-dichloropropane, benzene, bromodichloromethane, chlorobenzene, chloroform, dibromochloromethane, methylene chloride, and vinyl acetate.

Detailed information with respect to the identification of COPCs detected in soil and groundwater samples is presented in the tables indicated below.

Tables 2 - 7	surface soil
Tables 8 - 13	subsurface soil
Table 14	perched groundwater
Table 15	alluvial groundwater
Tables 16 and 17	sediment

2.2.3.4 Identification of Transport Routes

Impacted media include surface soil, subsurface soil, sediment, perched groundwater, and alluvial groundwater. Contamination of the air is possible because of contaminated soil. Airborne COPCs were evaluated as volatiles and particulates. Concentrations of airborne chemicals from soil were calculated using guidance presented in *Soil Screening Guidance* (USEPA, 1996). Contamination of the air is also possible because of VOCs released to air from contaminated alluvial groundwater. Concentrations of airborne VOCs were determined using mathematical models.

2.2.4 Concentrations to be Used in Risk Assessment

The exposure point concentration (EPC) is the concentration of a contaminant in an exposure medium that may be contacted by a receptor. EPCs were selected based on suggestions provided in RAGS Part A. The upper confidence limit of the arithmetic mean (95% UCL) values were estimated when the available data set was suitable using the State of Washington Department of Ecology Model Toxics Cleanup Act statistical software called MTCA*Stat* (Version 2.1). For data sets where a UCL could not be estimated, the maximum detected concentration was selected as the EPC by default. Generally, the maximum concentration was selected as the EPC for the following situations:

- the population of the data set was less than 10
- the 95% UCL was greater than the maximum detected concentration

The 95% UCL was calculated using the statistical software based on the assumptions listed below when estimating the UCL:

- For nondetects, the reported sample quantitation limit (SQL) or practical quantitation limit (PQL) was substituted with ½ the SQL or ½ the PQL. The distribution of this modified data set was then determined. If the data distribution was lognormal, the H-statistic was

used to estimate the UCL. If the data distribution was normal the t-statistic was used to estimate the UCL.

- For data distributions that were determined by the software to be neither normal nor lognormal distribution, lognormal distribution was assumed and the H-statistic was used to estimate the UCL (USEPA, 1992b).

Tables 18 through 32 present the EPC concentrations by site and media. Output tables from the MTCA*Stat* program are presented in Appendix C.

2.3 Exposure Assessment

The objective of the exposure assessment is to estimate the type and magnitude of exposures to the COPCs present at or migrating from a site. Results of the exposure assessment will be integrated with chemical-specific toxicity information in order to characterize human health risks potentially associated with the site.

2.3.1 Evaluation of Exposure Pathways

Exposure pathways describe the movement of chemicals from sources (e.g., soil and groundwater) to exposure points, where receptors (i.e., potentially exposed populations) may come in contact with chemicals.

An exposure pathway is typically defined by the following components:

- A source and mechanism of chemical release to the environment.

- An environmental transport medium (e.g., air, water) for the released chemicals.

- A point of potential contact between a receptor and the contaminated medium (i.e., point of exposure).

- An exposure route (e.g., inhalation, ingestion, dermal contact) at the point of exposure.

An exposure pathway is considered complete only if all four components are present. In conducting a risk assessment, only complete exposure pathways are quantitatively evaluated. Exposure pathways that have been identified as potentially applicable to site conditions are presented in Section 2.3.1.3.

2.3.1.1 Physical Setting

Climate

Arkansas has a humid mesothermal climate characteristic of the southeast to south-central United States. The area rainfall is 50 inches per year, with the most precipitation occurring between February and April. Phillips County is an attainment area for all primary and secondary air pollutants. The prevailing wind is southwest at an average speed of 8 mph and travels in that direction 12.3% percent of the time. The average annual temperature is 62.7°F.

Groundwater Uses

Onsite

The CCC plant receives water from two potable water supplies. The front offices, shower room, and laboratory receive potable water from the City of West Helena. The City of Helena supplies the rest of the plant.

Offsite

During preparation of the 1995 *Interim Response Work Plan* (EnSafe, 1995), a well survey identified residential and agricultural wells within the vicinity of the site. The sections below

describe the results of the residential and agricultural well survey. Figure 11 presents residential and agricultural wells within the vicinity of CCC.

Residential Wells

Nineteen residences down- or across-gradient from the CCC facility were either visited or observed during the residential well survey. Several of the downgradient residences are located within a 1 mile radius of the site, primarily on Phillips Road. Wells formerly supplied all residences with domestic water; however, all homes have been connected to the city water system for over 10 years. Based on the survey, the wells are currently in various states of disrepair: some are capped, some are open with no pumps, others have non-usable pumps. None of the residences surveyed are currently using private wells as a source of drinking water.

Agricultural Wells

Data on agricultural wells near the site were obtained from the U.S. Department of Agriculture Soil Conservation Service extension office in Helena, Arkansas. These wells range from 120 to 125 feet deep, and are thus screened in the basal portion of the alluvial aquifer.

There are thirteen wells that are within 1 to 2 miles of the site that are used primarily to irrigate cotton fields. However, because crop rotation occurs in these areas, water from these wells could also be used to irrigate soybean and wheat fields.

Land Use Conditions

CCC is an active chemical manufacturing facility in Phillips County, Arkansas, just south of West Helena, Arkansas. Land use conditions in the immediate vicinity of the site are either agricultural or industrial. Specifically, the CCC site is bound by Arkansas Highway 242 to the

northwest, a Union-Pacific railway to the northeast, and other industrial park properties to the southeast and southwest. The land across Highway 242 is agricultural. Residential areas are located within one half mile southwest and northeast of the site.

2.3.1.2 Exposure Points

An exposure point is defined as a location of potential contact between a receptor and a chemical. For the purpose of this risk assessment, it was conservatively assumed that COPCs were uniformly distributed throughout the individual sites. Under future land use conditions it was assumed that visitors could be exposed to sediment and surface soil. Under current and future land use conditions site workers could be exposed to sediment and surface soil. Construction workers could be exposed to surface and subsurface soil, and perched groundwater assuming construction activities occur in the future.

2.3.1.3 Exposure Pathways

Exposure pathways describe modes of contact with an intake of the COPCs at the exposure points. COPC sources, locations and types of activity patterns are assessed to determine significant pathways of exposure. Relevant pathways for receptors exposed to chemicals detected at CCC are presented below.

Potentially Exposed Population	Medium	Exposure Pathway
Current Land Uses		
Site Workers	Air	Inhalation of gaseous contaminants released from soil
	Air	Inhalation of chemicals entrained in fugitive dust
	Surface Soil	Incidental ingestion
	Surface Soil	Dermal contact

Potentially Exposed Population	Medium	Exposure Pathway
Future Land Uses		
Site Workers	Air	Inhalation of gaseous contaminants released from soil
	Air	Inhalation of chemicals entrained in fugitive dust
	Surface Soil	Incidental ingestion
	Surface Soil	Dermal contact
Future Onsite Construction Workers	Air	Inhalation of gaseous contaminants released from soil
	Air	Inhalation of chemicals entrained in fugitive dust
	Surface and Subsurface Soil	Incidental ingestion
	Surface and Subsurface Soil	Dermal contact
	Sediment	Incidental ingestion
	Sediment	Dermal contact
	Perched groundwater	Incidental ingestion
	Perched groundwater	Dermal contact
Future Offsite Agricultural Workers	Air	Inhalation of gaseous contaminants released from alluvial groundwater
Future Site Trespassers (Adolescents, 7 through 16 years old)	Air	Inhalation of gaseous contaminants released from soil
	Air	Inhalation of chemicals entrained in fugitive dust
	Surface Soil	Incidental ingestion
	Surface Soil	Dermal contact
	Sediment	Incidental ingestion
	Sediment	Dermal contact

2.3.2 Fate and Transport Modeling

Concentrations of airborne chemicals from soil were estimated using mathematical models to approximate the fate and transport processes in the ambient environment.

Airborne chemicals from soil were evaluated as VOCs and fugitive dust. Concentrations of volatiles from soil were calculated using methods outlined in Soil Screening Guidance: User's Guide (USEPA, 1996) which require the calculation of chemical-specific soil-to-air volatilization factors (VF). The calculation of VF values was completed using the model presented on the Soil Screening Level website (http://risk.lsd.ornl.gov/epa/ssl1.htm). The results of these calculations are presented in Appendix D.

The rate of fugitive dust emission from the soil surface is dependent upon a variety of factors, including surface roughness and cloddiness, surface soil moisture content, type and amount of vegetative cover, wind velocity, etc. Concentrations of chemicals in fugitive dust particles from soil were calculated using the default assumptions and methods presented in Soil Screening Guidance: User's Guide (USEPA, 1996).

Air concentrations associated with irrigation were estimated for COPCs in alluvial groundwater using the mathematical model described in Equations 1 through 3. These air concentrations were conservatively estimated based on exposure to one square acre of land at a temperature of 80° F and a wind speed of 1 m/sec. It is assumed that the land is supplied with an inch of water (102,800 liters) on a given day and that the contaminated water is supplying a constant molar flux from the water to the air over the square acre. The following equation, a solution of Fick's law, was used to calculate the molar flux.

$$N_A = \frac{P \times D_{AB} (p_{A1} - p_{A2})}{(z_2 - z_1) RT (p_B)_{lm}} \qquad \textit{Equation 1}$$

N_A = Molar Flux of 2-propanol (moles per square feet per pound [moles/ft^2 - lb])

P = Total pressure of system [14.7 pounds per square inch (psi)]

D_{AB}	=	Diffusion coefficient for each VOC (A) in air (B) (≅ 1E-05 square meters per second [m^2/sec])
p_{A1}	=	Partial pressure of VOC at point 1
p_{A2}	=	Partial pressure of VOC at point 2 (0 psi)
$(p_b)_{lm}$	=	Log mean of air pressure
z_2	=	Point 2 in feet (5 millimeters [mm])
z_1	=	Point 1 starting point of liquid (0 mm)
R	=	Gas Constant 10.73 (cubic feet-pounds per square inch/pound-mole-°Rankine
T	=	Temperature °R (80 °F)

The vapor pressure for each VOC was calculated using Henry's Law, as described by Equation 2.

$$P_{vp} = H_c \times C_w \qquad \textit{Equation 2}$$

Where:

P_{vp}	=	Air vapor pressure (psi)
H_c	=	Henry's Law constant (chemical-specific)
C_w	=	Concentration in water (milligrams per liter [mg/L])

The Henry's Law constants were collected from the literature (Sawyer, 1994; Davis, 1998; DOE Risk Assessment Information System, http://risk.lsd.ornl.gov/rap_hp.htm). Air vapor pressure (P_{vp}) estimated using Equation 2 was substituted for P_{A2} in Equation 1.

A mass balance was derived over a hypothetical volume consisting of a square acre (approximately 64 meters [m] × 64 m) times a height of 6 feet. It was assumed that vapor coming off the

irrigation water stayed within this hypothetical volume except for dilution air traveling at a horizontal speed of 1 meter per second (m/sec). This would produce approximately 60 air exchanges per hour based on 64 m divided by 1 m/sec. This air flow dilutes vapors released from the alluvial groundwater.

Equation 3 represents the mass balance over this volume with 60 air exchanges. Steady state assumptions were used, and the left hand side of the equation was set to zero and the equation was solved for concentration of VOCs. The average and maximum water concentrations were used for each chemical to calculate a specific molar flux (N_a) for each scenario.

$$\frac{dC}{dt} = N_a - 41.63 hr^{-1}\, C \qquad \textit{Equation 3}$$

Where:

dC/dt = change in VOC concentration over time
N_a = Molar flux
C = VOC concentration

VOC concentrations in air are summarized in Table 33.

2.3.3 Potentially Exposed Populations

The known or potential human receptors for current and future land use conditions include:

Current Land Use	Future Land Use
Onsite Workers	Construction Worker
Offsite Agricultural Worker	Adolescent Trespasser
	Offsite Agricultural Worker
	Onsite Workers

2.3.4 Quantification of Intakes

Estimates of exposure to COPCs are required for quantitative risk characterization. The basic equation used to calculate the human intake is as follows:

$$Intake = C \times \frac{CR \times EF \times ED}{BW \times AT}$$

Where:

Intake = daily intake (milligrams per kilogram per day [mg/kg-day])

C = concentration of the chemical (e.g., milligram per kilogram [mg/kg] in soil, milligrams per liter [mg/L] in water or milligram per cubic meter [mg/m^3] in air)

CR = contact rate; the amount of contaminated medium contacted over the exposure period (e.g., milligram per day [mg/day] for soil, liters per day [L/day] for water, and cubic meters per day [m^3/day] for air)

EF = exposure frequency; describes how often exposure occurs (days/year)

ED = exposure duration; describes how long exposure occurs (years)

BW = body weight; the average body weight over the exposure period (kilograms [kg])

AT = averaging time; period over which exposure is averaged (days)

Each of the intake variables in the above equation consists of a range of values. The intake model variables used generally reflect 50th or 95th percentile values which, when applied to the EPC, ensure that the estimated intakes represent the reasonable maximum exposure (RME). Formulas were derived from RAGS, Part A unless otherwise indicated.

The pathway-specific intake formulas, variables, and calculations are presented for each receptor. For the adult worker, trespasser, construction worker, and offsite agricultural worker two different types of tables are presented. The first table type presents the formula, assumed input values, associated references, and relevant comments. This table should be consulted for details and rationale regarding the parameter values used in the calculations. Each variable table is immediately followed by tables presenting the actual calculations using the information contained in the variable table. For clarity, each variable of the intake equation is included in the calculation tables. The tables are numbered as follows:

	Soil	Sediment	Groundwater
Construction Worker	Tables 34 - 37	Tables 38 - 40	Tables 41 - 43
Site Worker	Tables 44 - 47	N/A	N/A
Adolescent Trespasser	Tables 48 - 51	Tables 52 - 54	N/A
Offsite Agricultural Worker	N/A	N/A	Tables 55 - 56

Because site worker exposure at Site 4 differs from all other CCC sites, the exposure parameters used to develop pathway specific intake factors were adjusted to account for site specific exposure patterns. For Site 4, it was assumed that the workers were exposed only during shipping and receiving activities. Tables outlining pathway specific intake formulas, variables, and calculations are presented in Appendix E.

2.4 Toxicity Assessment

The objectives of the toxicity assessment are to evaluate the potential for particular contaminants to cause adverse effects in exposed individuals, and to provide the analytical framework for the characterizing human health impacts.

2.4.1 Toxicological Information for Noncarcinogenic Effects

For the purpose of assessing noncarcinogenic risks, the USEPA has adopted the science policy position that protective mechanisms such as repair, detoxification, and compensation must be overcome before the adverse health effect is manifested. Therefore, a range of exposures exists from zero to some finite value that can be tolerated by an organism without appreciable risk of expressing adverse effects.

USEPA gauges potential noncarcinogenic effects by identifying the upper boundary of the tolerance range (threshold) for each chemical and deriving an exposure estimate below which adverse health effects are not expected to occur. Such an estimate for the oral exposure route is called an oral reference dose (RfD), and for the inhalation exposure route is an inhalation reference concentration (RfC). The oral RfD is typically expressed as milligrams (mg) chemical per kilograms (kg) body weight per day, and the inhalation RfC is usually expressed in terms of concentration in air (i.e., mg chemical per m^3 of air). However, for the purpose of a baseline risk assessment, inhalation RfC values can be converted to dosage units by multiplying them by the inhalation rate (20 m^3/day, an upper-bound estimate for combined indoor-outdoor activity) and dividing by the body weight (70 kg, average adult body weight):

$$RfD_{inhalation} = \frac{RfC \times IR_{inhalation}}{BW}$$

Where:

$RfD_{inhalation}$	=	Inhalation reference dose (mg/kg-day)
RfC	=	Reference concentration (mg/m^3)
$IR_{inhalation}$	=	Inhalation rate (m^3/day)
BW	=	Body weight (kg)

Two types of oral RfDs/inhalation RfCs are available from the USEPA - chronic or subchronic- which are based on length of exposure. Chronic oral RfDs/inhalation RfCs are specifically developed to protect against long-term exposure to a compound, and are generally used to evaluate the noncarcinogenic effects associated with exposure periods between 7 years (approximately 10% of a human lifetime) and a lifetime. Subchronic oral RfDs/inhalation RfCs are useful for characterizing potential noncarcinogenic effects associated with shorter-term exposures. As a current guideline for Superfund program risk assessment, subchronic oral RfDs/inhalation RfCs are used to evaluate the potential noncarcinogenic effects of exposure periods between 2 weeks and 7 years.

The toxicological criteria used for evaluating the noncarcinogenic health effects potentially associated with exposure to chemicals of concern are presented in Tables 57 (for the oral route) and Table 58 (for the inhalation route). Relevant information, such as most sensitive target organs and/or systems, uncertainty factors used as basis for the derivation of toxicological criteria, and sources of information, is also included in these tables.

No toxicological criteria are currently available for gauging potential human health concerns associated with the dermal exposure route. For risk assessment purposes, oral RfDs are recommended as the default dermal RfDs (USEPA 1989a), if:

- Health effects following exposure are not route-specific.

- Portal-of-entry effects (e.g., dermatitis from dermal exposure and respiratory effects from inhalation exposure) are not the principal effects of concern.

Exposure through the dermal route is generally calculated as an absorbed dose, while oral RfDs are expressed as administered doses. Therefore, adjustments are necessary to match the dermal exposure estimates with the oral RfDs. Current USEPA Superfund guidance is to adjust the oral RfD with an oral absorption factor (i.e., percentage of the chemical absorbed) in order to extrapolate a default dermal RfD, which is expressed in terms of absorbed dose. The equation for extrapolation of a default dermal RfD is:

$$RfD_{dermal} = RfD_{oral} \times Oral\ Absorption\ Factor$$

Where:

RfD_{dermal}	=	Dermal reference dose (absorbed dose in mg/kg-day)
RfD_{oral}	=	Oral reference dose (administered dose in mg/kg-day)

The default dermal RfDs and the oral absorption factors used in calculations are presented in Table 57.

2.4.2 Toxicological Information for Carcinogenic Effects

For the purpose of assessing risks associated with potential carcinogens, the USEPA has adopted the science policy position of "no-threshold"; i.e., there is essentially no level of exposure to a carcinogen that will not result in some finite possibility of tumor formation.

The USEPA has formed a Carcinogen Risk Assessment Verification Endeavor (CRAVE) work group. The purpose of CRAVE is to evaluate the weight of evidence using the available carcinogenicity data to estimate excess lifetime cancer risks from various levels of exposure to potential human carcinogens by establishing weight-of-evidence classifications and developing numerical carcinogenic risk estimates (slope factors or unit risks).

The weight-of-evidence classification assigned to a potential carcinogen by the USEPA is an estimation of the likelihood that an agent is a human carcinogen, based on best professional judgment of the quality of available data. The classification does not affect numerical carcinogenic estimates. USEPA classifications are outlined below:

Group A chemicals (human carcinogens)

Group A chemicals are those for which there is sufficient evidence to support a causal association between human exposure to these chemicals and subsequent development of cancer.

Groups B1 and B2 chemicals (probable human carcinogens)

Groups B1 and B2 chemicals are those for which there is limited (B1) or inadequate (B2) evidence of carcinogenicity based on human studies. Group B2 agents are also generally supported by carcinogenicity data in animal studies.

Group C chemicals (possible human carcinogens)

Group C chemicals are those for which there is limited evidence of carcinogenicity in animals.

Group D chemicals (i.e., not classifiable as to human carcinogenicity)

Group D chemicals are those with inadequate human and animal evidence of carcinogenicity, or for which no data are available. Numerical carcinogenic risk estimates are not typically calculated for Group D chemicals because of the lack of pertinent dose-response data.

Group E chemicals (i.e., evidence of non-carcinogenicity in humans)

Group E chemicals are those for which there is no evidence of carcinogenicity from adequate human or animal data.

Two types of quantitative estimates are available from CRAVE for evaluating carcinogenic potency associated with oral exposure: slope factor, expressed in terms of risk per unit dose (as units of $[mg/kg\text{-}day]^{-1}$), and unit risk, expressed as risk per unit concentration in drinking water (micrograms per liter $[\mu g/L]^{-1}$).

Inhalation unit risks (an expression of carcinogenic risk per unit concentration in air) are verified by USEPA's CRAVE work group as a numerical estimate of the carcinogenic risks associated with inhalation exposure to carcinogens. The inhalation slope factors (an expression of carcinogenic risk per unit dose) calculated by the USEPA were removed from the Integrated Risk Information System (IRIS) in January 1991 because CRAVE believed that the concentration in air, rather than the total body dose, was a better index of inhalation exposure. To facilitate quantitative risk assessment, the current Superfund guidance is to convert an inhalation unit risk to a body dose, as directed in the Health Effects Assessment Summary Tables (HEAST), by using the following equation:

$$SF_{inhalation} = \frac{UR_{inhalation} \times BW \times CF}{IR_{inhalation}}$$

Where:

$SF_{inhalation}$	=	Inhalation slope factor $(mg/kg\text{-}day)^{-1}$
$UR_{inhalation}$	=	Inhalation unit risk (micrograms per cubic meter $[\mu g/m^3]^{-1}$)
$IR_{inhalation}$	=	Upper bound estimate of inhalation rate (20 m^3/day)
CF	=	Conversion factor (micrograms per milligram [μg/mg])

The toxicological information regarding the carcinogenic health concern related to the chemicals that have been selected for the quantitative risk assessment is presented in Table 59 (oral route)and Table 60 (inhalation route). Information presented in these tables includes carcinogenic weight-of-evidence classifications, quantitative cancer potency estimates (i.e., oral slope factors and inhalation unit risks), along with primary tumor sites that have been reported, and sources of information.

Current USEPA Superfund guidance for calculating a dermal slope factor is to adjust the oral slope factor with an oral absorption factor specific to that chemical, using the following equation:

$$SF_{dermal} = \frac{SF_{oral}}{Oral\ Absorption\ Factor}$$

Where:

SF_{dermal}	=	Dermal slope factor $(mg/kg\text{-}day)^{-1}$
SF_{oral}	=	Oral slope factor $(mg/kg\text{-}day)^{-1}$

The default dermal slope factors for the chemicals of concern, along with the oral absorption factors used are presented in Table 59.

2.5 Risk Characterization

This step of the risk assessment integrates information obtained from the exposure and toxicity assessments (Sections 3.0 and 4.0, respectively) to characterize the potential risks posed by site COPCs.

Risk characterization methodology includes the following steps:

- Organize exposure and toxicity assessments outputs by the duration and exposure route for each population.

- Quantify total carcinogenic and noncarcinogenic risks for each pathway by summing the estimated risks estimated for each COPC.

- Estimate overall risks affecting each population over the same time period by combining risks across pathways.

- Analyze and discuss inherent risk characterization uncertainties.

2.5.1 Quantification of Noncarcinogenic Risk

Noncarcinogenic risk is expressed as an HQ, which is the ratio of the exposure intake (calculated in the exposure assessment) over the reference dose (acceptable intake indicated by oral RfD or inhalation reference value from the toxicity assessment). An HQ less than or equal to 1 indicates that an individual is unlikely to experience adverse health effects from exposure to the COPC (USEPA, 1989). The HQ is calculated as follows:

$$HQ = \frac{DI}{RfD}$$

Where:

HQ = hazard quotient (unitless)
DI = daily intake (mg/kg-day)
RfD = reference dose (mg/kg-day)

A hazard index (HI) is calculated by summing the HQs in order to address noncarcinogenic additive effects between chemicals and cumulative effects across all routes of exposure.

2.5.2 Quantification of Carcinogenic Risk

Carcinogenic risk is characterized by calculating a CR probability. The CR is a unitless incremental probability of an individual developing cancer from a lifetime exposure to a COPC (USEPA, 1989). For low risk levels (below estimated risk of 0.01), the CR is calculated by multiplying the exposure intake (calculated in the exposure assessment) by the cancer slope factor (from the toxicity assessment). The criterion typically used by regulatory agencies for demonstration of no carcinogen risk of concern is a CR of less than one in a million. A CR is calculated as follows:

$$CR = DI \times SF$$

Where:

CR = cancer risk (unitless)
DI = daily intake (mg/kg-day)
SF = slope factor $(mg/kg\text{-}day)^{-1}$

To address multiple chemicals, the additive carcinogenic effects of chemicals and cumulative effects across all routes of exposure were addressed by summing the individual CRs.

$$CR_{SITE} = CR_{PATHWAY_A} + CR_{PATHWAY_B} + CR_{PATHWAY_C} \cdots$$

Where:

CR_{SITE} = Sum of cancer risk calculated for COPCs in each pathway
$CR_{PATHWAY}$ = Cancer risk for each applicable exposure pathway

2.5.3 Results of Risk Characterization

Results of the risk characterization are presented for each land use condition and exposure pathway in the following tables in Appendix A:

Site	Tables
1	61A — 63E
2	64A — 66C
3	67A — 68C
4	69A — 71C
5	72A — 72C
6	73A — 75C
9	76A — 78C
Offsite	79A — 79C

2.5.3.1 Discussions of Risk Characterization

Regulatory agencies have developed criteria for the demonstration of carcinogenic and noncarcinogenic risks. A CR ranging between one in one million (1×10^{-6} or 1E-06) and one in ten thousand (1×10^{-4} or 1E-04) is currently used by USEPA as the target risk level for carcinogenic effects, whereas an HI of one is used as the target risk level for noncarcinogenic effects. Tables 80 through 83 summarize those carcinogenic and noncarcinogenic risks exceeding 1E-06 and 1 for each site and receptor.

With the exception of alluvial groundwater exposure for the offsite agricultural worker, and the Site 2 adult worker exposure to arsenic in surface soil, carcinogenic risk for the remaining media (perched groundwater, sediment and soil) have cumulative CRs that are less than 1E-04. The construction worker and trespasser carcinogenic risks are less than 1E-04.

Groundwater carcinogenic risk for alluvial groundwater is 5E-01. Because the magnitude of risk is greater than 1E-02, risk was calculated using the one-hit equation [i.e., $Risk = 1 - \exp(-CDI \times SF)$] as presented in RAGS Part A. The primary contributor to carcinogenic risk for alluvial groundwater is 1,2-dichloroethane. Methylene chloride (2E-03), chloroform (2E-04), and benzene (8E-04) were also above the 1E-04 threshold.

Tables 80 through 83 summarize the noncarcinogenic risks exceeding unity for each receptor. HIs for several sites exceed unity, suggesting that COPCs may pose adverse noncarcinogenic impact to receptors evaluated in the HHRA. The construction worker (Table 80) soil exposures exceed unity at sites 2, 3, 4, and 9. The primary contributor to the soil HQ is dinoseb (sites 3, 4, and 9) and 1,2-dichloroethane at Site 2. 4-Chloroaniline, 1,2-dichloroethane, and methylene chloride are the primary contributors to HQ for perched groundwater.

Table 81 outlines those noncarcinogenic risks exceeding unity for the adult worker exposure to surface soil. Dinoseb at Site 9 and arsenic at Site 2 are the primary contributors to noncarcinogenic risk.

Table 82 presents those noncarcinogenic risks exceeding 1 for the trespasser. Site 9 is the only site with unacceptable noncarcinogenic risk. The primary contributors are dinoseb and propanil.

Table 83 presents those noncarcinogenic risks exceeding unity for the offsite agricultural worker exposure to airborne VOCs released from alluvial groundwater. Benzene, chlorobenzene, methylene chloride, and 1,2-dichloroethane, and 1,2-dichloropropane are the primary contributors to noncarcinogenic risk.

2.5.4 Chemicals of Concern Identified by Site and Media

A contaminant was selected as a COC if its CR exceeded 1E-6 or had an HQ greater than 1. COCs are listed below by site and media:

Site	Surface Soil	Subsurface Soil	Sediment
1	None	None	Arsenic
2	None	1,2-Dichloroethane	N/A
3	N/A	Dinoseb	None
4	Dinoseb	3,4-Dichloroaniline, Dinoseb	N/A
5	N/A	Dinoseb	N/A
6	None	NA	N/A
9	Dinoseb, Propanil	3,4-Dichloroaniline, Dinoseb, Propanil	N/A
Perched Groundwater		4-Chloroaniline, 1,2-Dichloroethane, Methylene chloride	
Alluvial Groundwater		Benzene, Chloroform, Methylene Chloride, 1,2-Dichloroethane, 1,2-Dichloropropane, and Chlorobenzene	

Note:
N/A = Not applicable.

2.5.5 Central Tendency Evaluation

Where RME estimates of risk indicated a significant threat (an CR greater than 1E-4 or an HQ greater than 1) would be posed to human health, central tendency (CT) analysis was performed. The CT analysis uses the arithmetic mean concentration as the EPC and 50th percentile exposure assumptions that are consistent with guidance provided in *Exposure Factor's Handbook* (USEPA, 1997). Central tendency exposures are presented for comparison to risks associated with RME exposure.

A CT evaluation was completed for the following sites, media, and chemicals.

Receptor	Site	Media	Chemicals
Construction Worker	1 & 2	Perched Groundwater	4-Chloroaniline, 1,2-Dichloroethane, Methylene chloride
	3	Surface and Subsurface Soil	Dinoseb
	4	Surface and Subsurface Soil	3,4-Dichloroaniline, Dinoseb
	5	Surface and Subsurface Soil	Dinoseb
	9	Surface and Subsurface Soil	3,4-Dichloroaniline, Dinoseb, Propanil
Adult Worker	9	Surface Soil	Dinoseb, Propanil
Trespasser	9	Surface Soil	Dinoseb, Propanil
Offsite Agricultural Worker	—	Alluvial Groundwater	Benzene, Chloroform, Methylene chloride, 1,2-Dichloroethane, 1,2-Dichloropropane

Tables 84 through 93 summarize present risks calculated for CT exposure. Intake factor calculations used to develop the CT exposure are presented in Appendix E.

Construction Worker

Tables 84A through 84C present the noncarcinogenic and carcinogenic risks for the construction worker exposed to perched groundwater. Using CT exposure assumptions noncarcinogenic and carcinogenic risks are below threshold levels.

Tables 85A through 85C present the noncarcinogenic risks for the construction worker exposed to dinoseb in subsurface soil at Site 3. Noncarcinogenic risk has been reduced to less than 1 using CT exposure assumptions.

Tables 86A through 86C present the noncarcinogenic risks for the construction worker exposed to 3,4-dichloroaniline and dinoseb in surface and subsurface soil at Site 4. Using CT exposure assumptions noncarcinogenic risks are less than 1.

Tables 87A through 87C present the noncarcinogenic risks for the construction worker exposed to dinoseb in Site 5 surface and subsurface soil. Using CT exposure assumptions noncarcinogenic risks are less than 1.

Tables 88A through 88C present the noncarcinogenic risks for the construction worker exposed to 3,4-dichloroaniline, dinoseb, and propanil in Site 9 surface and subsurface soil. Using CT exposure assumptions noncarcinogenic risks are less than 1.

Adult Worker

Tables 89A through 89C present the noncarcinogenic risk for the adult worker exposed to dinoseb in Site 9 surface soil. Using CT exposure assumptions noncarcinogenic risks remain greater than 1.

Trespasser

Tables 90A through 90C present the noncarcinogenic risks for the trespasser exposed to dinoseb and propanil in Site 9 surface soil. Using CT exposure assumptions noncarcinogenic risks are less than 1.

Offsite Agricultural Worker

Tables 91A through 91C present the noncarcinogenic and carcinogenic risks for the offsite agricultural worker exposed to VOC released from alluvial groundwater during irrigation. Using CT exposure assumptions noncarcinogenic risks remain substantially greater than 1. 1,2-Dichloroethane (1511), chlorobenzene (4), 1,2-dichloropropane (6), and benzene (8) are the primary contributors to noncarcinogenic risk. Additionally, carcinogenic risk remains above 1E-4. 1,2-Dichloroethane (1E-02), methylene chloride (5E-4) and benzene (2E-4) are the primary contributors to carcinogenic risk. Because the magnitude of risk associated with exposures to 1,2-dichloroethane is greater than 1E-02, risk was calculated using the one-hit equation as presented in RAGS Part A.

2.5.6 Discussion of Uncertainty

2.5.6.1 Data Evaluation Uncertainties

A conservative approach was used in reviewing available analytical data and selecting COPCs for the quantitative risk assessment. The selection of a compound as a COPC does not necessarily suggest that it poses a human health or environmental concern for the site under investigation. Inclusion of a chemical in the quantitative risk assessment only indicates a need for further examination of the compound in order to determine if there are any risks from exposure to this chemical.

There were three background surface soil samples collected at CCC. Because of the lack of information associated with background metals concentrations, it is unknown whether arsenic and

lead should be COCs. The lack of data identifying the naturally occurring levels of arsenic in native soil and lead in alluvial groundwater upgradient of CCC represents a data gap and could potentially lead to an overestimate of risk.

Concentrations used in the risk assessment were conservatively determined. It was assumed that the chemicals in soil occurred uniformly on ground surface. Because of this conservative approach, actual site risks are expected to be substantially lower than those risks estimated in this risk assessment.

2.5.6.2 Exposure Assessment Uncertainties

Uncertainties in the exposure assessment could arise from the following sources:

- Use of standard assumptions instead of site-specific data selected on the basis of "best professional judgment."

- Selection of a value from a wide range reported in published literature thought to best represent the site under study.

- The degree of "protectiveness" or "conservatism" inherent in the current risk assessment guidance.

- Lack of sufficient data and necessary assumptions made in order to complete the quantitative risk assessment.

The types and sources of exposure uncertainties are outlined below.

Calculation of Exposure Point Concentrations

A conservative approach was used to estimate the concentrations at the point of exposure, not considering degradation of any chemicals in the environmental media. Because it has been well recognized that many organic chemicals can undergo degradation processes in the environment, this conservative approach is expected to result in an overestimate of risk.

Selection of Exposure Pathways

Although not considered likely in the actual environmental situation, it was assumed that the population of concern could simultaneously be exposed to multiple chemicals through all possible pathways. This conservative assumption is anticipated to overestimate of potential site risks.

Exposure Parameter Values for Each Pathway

In order to conduct a quantitative exposure assessment, many assumptions must be made concerning the exposure scenarios (e.g., frequency and duration of exposure, intake rate of contaminated media). Site-specific values are often unavailable and the use of default values (primarily upper bound estimates) is likely to contribute to exposure assessment uncertainty. For the hypothetical future scenarios (i.e., industrial and residential exposures), default values were used in the exposure assessment which are worst-case values and overestimate exposure. Summarized below are examples of uncertainties related to the selection of parameter values:

- **Inhalation Pathway**

  Inhalation rate (the volume of air inhaled per unit period of time) can vary according to an individual's age, weight, sex, activity level and general physical condition. In accordance with USEPA guidance (USEPA, 1991), the default inhalation rate of 20 m^3/day or 0.83 m^3/hr was used in the risk assessment for adult receptors. This value is considered to be an upper-bound value for adults representing inhalation during active hours. Values of 13.3 m^3/day (equivalent to 0.55 m^3/hr) and 8.7 m^3/day (equivalent to 0.36 m^3/hr) are

recommended, respectively, by USEPA as the average daily inhalation rate for adults and children (between ages of 1 and 12) for continuous exposure in which specific activity patterns are not known (USEPA, 1997). Therefore, use of the default value is expected to overestimate potential inhalation risk.

- **Ingestion Pathway**

In accordance with USEPA guidance (USEPA, 1991), the following combined soil and dust ingestion rates were used in this risk assessment: 50 mg/day (for adolescent trespassers and site workers) and 480 mg/day (for construction workers).

There are no reliable data for estimating adult soil ingestion rates. A soil ingestion rate of 50 mg/day for adults in commercial/industrial setting is recommended as a standard default value (USEPA,1991), which is based on a preliminary adult soil ingestion study by Calabrese (1991). However, Calabrese and Stanek have since determined that the soil ingestion rates reported in their preliminary study were invalid, and that the previously derived ingestion rate of 50 mg/day is an overestimation (Calabrese and Stanek, 1991).

USEPA does not provide default soil ingestion values for a trespassing scenario. In the absence of this information, soil and sediment ingestion was estimated to be 50 mg/day.

In summary, the soil ingestion rates currently recommended by USEPA (i.e., 50 mg/day for adolescent trespassers and adults in a commercial/industrial environment and 480 mg/day for construction workers) are overly conservative and not supported by the scientific literature. Therefore, use of these default soil ingestion rates in the site-wide risk assessment is expected to result in an overestimation of risk.

- **Dermal Pathway**

Exposed Skin Area — The amount of chemical intake correlates directly with the exposed skin surface area. Climatic conditions could determine the type of clothing worn, and thus the skin area exposed. USEPA currently recommends that 5% of the skin is exposed during winter, 10% during spring and fall, and 25% during summer (USEPA, 1996b). Assuming an adult body surface area of 20,000 cm^2, exposed skin surface areas would be: 1,000 cm^2 in winter, 2,000 cm^2 in spring and fall, and 5,000 cm^2 in summer.

For CCC exposed skin surface areas of 2,900 cm^2 and 4,100 cm^2 were selected for evaluating dermal exposures to soil for a child and adult (residential and industrial) populations. These values represent 20% of the body surface, assuming an individual is wearing a short-sleeved shirt, long pants, and shoes with only the head (1,400 cm^2), hands (1,120 cm^2), and forearms (1,570 cm^2) exposed. For the trespasser, the exposed skin surface is assumed to be 2,900 cm^2. This is based on 20% of the total body surface for an adolescent ages 7-16 years old. The values used are conservative for these scenarios.

Soil-to-Skin Adherence Factor (AF) — A default AF value of 1 mg/cm^2 is recommended by USEPA for estimating intake of chemicals in soil via dermal exposure route (USEPA, 1995). This value was first provided in a USEPA report as an upper-bound estimate (USEPA, 1992a). Available studies indicate that adherence levels vary considerably with the type of activities and across different parts of the body (USEPA, 1997). Because the AF was not adjusted to account for these variables, risk associated with dermal contact exposure is most likely overestimated.

Absorption Factor (ABS) — Very limited information is available concerning dermal absorption of chemicals from contaminated soil under realistic environmental conditions. In fact, there are no actual epidemiological data to support the current USEPA position that

absorption of soil-bound organics under realistic exposure conditions constitutes a complete pathway.

Region 4 USEPA (USEPA, 1995a) requires that ABS values be based on the following default values: organics: 1 percent and inorganics: 0.1 percent. For the development of Region 6 MSSLs, ABS values of 10 percent for organics and 1 percent for inorganics are used. It should be emphasized that information to support chemical-specific ABS is only available for the following chemicals: cadmium: 1 percent; PCBs: 6 percent; TCDD: 3 percent (low organic soil) and 0.1 percent (high organic soil); other dioxins: 3 percent (USEPA, 1992a). According to the recently released *Soil Screening Guidance* (USEPA, 1996c), pentachlorophenol is the only chemical among the 110 compounds evaluated to show greater than 10 percent dermal absorption. Therefore, quantification of dermal pathways has been deferred in several USEPA documents (USEPA, 1992a, 1996b) pending development of adequate data and methodology.

Because the ABS values suggested by Region 6 USEPA are considered to be highly conservative in light of existing data, these recommended ABS values were not used in this risk assessment for calculating intake of chemicals in soil through direct dermal contact. Region 4 USEPA ABS values were considered to be comparable to the values presented most recently in the literature. The ABS database for chemicals encountered as media contaminants is limited; therefore, the use of these default values could potentially overestimate or underestimate risk associated with dermal exposure.

- **Groundwater Inhalation Pathway**

Exposure Frequency (EF) — Inhalation of VOCs from groundwater for the offsite agricultural worker is a site-specific exposure pathway. The exposure frequency represents the number of irrigation events that occur during the growing season. Information

provided by the Phillips County Cooperative Extension Service indicates that irrigation occurs 7 to 10 days per month (average 8.5 days) during a growing season which begins in late April and ends in September. Assuming crops are irrigated 2.1 days in April and 8.5 days for the remaining months, the total irrigation events per year is 44.6 days.

The number of irrigation events is dependent upon climate and the type of crop irrigated. Some crops might require more irrigation during the growing season than others suggesting that the EF selected may result in risk that overestimate or underestimate risks to agricultural workers.

Exposure Time (ET) — The exposure time represents the time the agricultural worker is present during irrigation events. Because this is a site-specific scenario, there is limited information available which addresses this parameter. However, it was conservatively assumed that the agricultural worker would be present four at least 4 hours during irrigation events. Generally, irrigation systems are automated and do not require the presence of an operator during operation. Most systems are put into operation and the agricultural worker then leaves the field. Therefore risks associated with this exposure time are most likely overestimated.

Concentration in Air — Mathematical models were used to estimate the concentrations of VOCs that emanate from groundwater during irrigation. The groundwater concentrations used for modeling are from wells installed both on the CCC property and just beyond the property boundary. There were no samples collected from the agricultural wells used for irrigation. It was assumed that contaminants would move downgradient of the site resulting in contamination of the agricultural wells. Because it is unknown if these contaminants are undergoing any natural attenuation processes, the concentrations used for

this model are uncertain and may potentially overestimate or underestimate risk. The lack of data regarding the concentrations of VOCs in the agricultural wells is a data gap.

2.5.6.3 Toxicity Assessment Uncertainties

Uncertainties in the quantitative toxicity assessment are well recognized, but the degree can vary depending on the major sources of uncertainty for a particular site. The types of toxicity information uncertainties for this risk assessment are outlined below.

Uncertainties Inherent in the Risk Assessment Process

- Use of animal data to predict potential human health effects.

- Extrapolation of effects observed in animals exposed to high doses to probable outcomes in humans following exposure to low environmental contaminant levels.

- A conservative approach to calculate toxicological criteria such as the oral and dermal RfD and inhalation RfC with uncertainty spans of perhaps one order of magnitude. These estimates can change when additional information becomes available. The carcinogenic slope factors and unit risks are typically calculated by the USEPA using a linearized multistage model, which leads to a plausible upper-bound estimate of the risk, although the true value of the risk is unknown and may be as low as zero (USEPA, 1986).

Uncertainties Common to Current EPA Guidance on Risk Assessment

- Lack of pertinent toxicological data for the chemicals selected for the quantitative risk assessment. For this risk assessment, 3,4-dichloroaniline was retained as a COC. The risks calculated for this compound were derived using 4-chloroaniline toxicity values as surrogates. Currently, 3,4-dichloroaniline does not have published toxicity values and the information available describing its toxicity is limited. 4-Chloroaniline was used as a

surrogate based on similarities in structure. Therefore, the risk presented for this compound may be an overestimation or an underestimation of the actual risk.

- Lack of specific toxicity criteria for evaluation of the dermal exposure route. The current USEPA default position is to adjust the oral toxicity value with an oral absorption factor and adopt this adjusted value as the surrogate dermal toxicity value. The validity and scientific basis for this extrapolation warrant further deliberation, because the mechanism for absorption through a skin barrier (i.e., the dermal route) is expected to be different than absorption through a gastrointestinal system (i.e., the oral route). However, the current method recommended by USEPA for extrapolating default dermal toxicity values do not reflect the specific conditions under which the reference toxicological study was conducted (e.g., method of administration such as gavage, water, or diet, and vehicle of administration such as solvent, oil, or solution).

Uncertainties Specific to this Site

- Sites 1, 5, 6, and 8 are primarily pavement or gravel areas; therefore, surface soil exposures for the adult workers and trespassers would be minimized. Risks estimated for these areas are most likely overestimated.

- Perched groundwater exposure would most likely occur only if this water table was infiltrated during construction activities. Additionally depending on the volume of water present, construction activities may cease until the water is removed. Risks associated with construction worker exposure to perched groundwater are highly conservative and are most likely overestimated.

- Access to the CCC facility is controlled using fences, guards, and checkpoints. Trespassing onto the site is not likely; therefore, trespasser risk is most likely overestimated.

- Future land use for the site and the adjacent properties will most likely remain commercial/industrial or agricultural. If the site were to be used for residential or agricultural purposes in the future, the site would need to be reevaluated for those land use scenarios.

- The estimated VOC concentrations in air are applicable using the assumptions defined for the model used. However, given the variability in irrigation rates, the types of irrigation devices used, differences in irrigation methods, and changes in climate, the calculated VOC concentration in air could be either an overestimate or an underestimate of the actual concentration.

- The mathematical model used to estimate VOC concentrations released from alluvial groundwater is based on a box model assumption which does not take into account any affects dispersion to the atmosphere might have on airborne VOC concentrations. This would indicate that the airborne VOC concentrations are most likely overestimated.

- The concentrations used to estimate VOC concentrations in air are based on concentrations of VOCs in alluvial groundwater samples collected onsite or a considerable distance upgradient of the closest irrigation well where VOC concentrations would be expected to be higher. There were no samples collected from downgradient agricultural wells. The lack of this information represents a data gap. Because the concentration of VOCs in the agricultural wells is unknown the actual risk associated with VOCs released from alluvial

groundwater is uncertain. However, the risk estimates calculated using current onsite data most likely overestimate risk.

3.0 ECOLOGICAL EVALUATION

The ecological risk assessment (ERA) is a key component of the baseline risk evaluation. Its purpose is to develop a qualitative and/or quantitative ecological appraisal of the actual and/or potential effects of CCC contamination on the surrounding ecosystem. The assessment considers environmental media and exposure pathways that could result in unacceptable levels of exposure to flora and fauna currently or in the foreseeable future. The approach to assessing risk components was based on USEPA *Ecological Risk Assessment Guidance for Superfund: Process for Designing and Conducting Ecological Risk Assessments* (USEPA, 1997) and *Framework for Ecological Risk Assessment* (USEPA, 1992c).

3.1 Problem Formulation

Environmental Setting

For the ecological risk assessment only three areas of concern were identified. Area I consist of three ditches onsite that make up the storm water retention system. Area II consists of an approximately 2-acre isolated wetland located on the southwest boundary of the plant property. Area III includes all adjacent off-site non-industrial areas.

Area I

Area I consists of three ditches onsite which serve as a storm water retention system. This retention system is a component of the waste water treatment system identified as Site 3 in Figure 5. Storm water collected in these ditches is used in the wastewater treatment system as required by the facility's National Pollution Discharge Elimination System (NPDES) permit. These open ditches are vegetated with various grasses along the edges and submergent plants are present in the more frequently inundated portions. During the June 4, 1999 ecological survey two

species of tadpoles (Bullfrog, *[Rana catesbeiana]* and Southern leopard frog, *[Rana utricularia]*) were observed in the ditches. Two species of birds were also feeding in and around the ditches. The killdeer *(Charadrius vociferus)* which is a farm country plover and usually inhabits fields, airports, lawns, river banks, and shores and the green heron *(Butorides striatus)* which feed on a variety of fish, frogs, crawfish, insects, and other aquatic life.

Area II

Area II consists of an approximately 2-acre wetland constructed in 1978 to serve as an overflow retention pond for the waste water treatment system (see Figure 3). Once the pond was excavated, it was realized that an overflow system was not necessary; therefore, a connection between the treatment system and the ponds was never installed. Over the years the excavated area developed wetland characteristics through natural secession and now meets the Corps of Engineers definition of a wetland. The dominant wetland vegetation consists of black willow *(Salix nigra)*, Chickasaw plum *(Prunus angustifolia)*, common cattails (*Typha latifolia*), floating primrose willow (*Ludwgia spp.)* and duckweed (*Lemna spp*.).

Area III

Area III includes offsite non-industrial areas within one mile of the facility (see Figure 11). These areas include agriculture farm lands, ditches, and tributaries to Big Creek. The tributaries discharge into Big Creek is approximately 15 miles southeast of the facility.

Approximately 99% of Area III is in cultivation with cotton, soybeans, and in the fall/winter most fields have a cover crop of winter wheat.

3.2 Threatened and Endangered Species

Based on information provided by the Arkansas Game & Fish Commission and the Arkansas Natural Heritage Commission, there are 16 State and Federal listed threatened and endangered species in Phillips County. A copy of this list is presented in Appendix F. None of these species have been identified at or in the general area surrounding the site due primarily to the area's heavy industrialized/agricultural use.

3.3 Selection of Ecological Chemicals of Potential Concern

Ecological chemicals of potential concern (ECPC) resulting from historic site activities have been identified and quantified using USEPA's methods and protocols for sediment analyses. For this assessment only sediment samples were reviewed. No surface soil samples pertain to any of the 3 identified ecological areas. At Area I only sediment samples were collected. At Area II one geoprobe borehole was installed and both water and soil were collected. Area III sampling consist of deep subsurface soil samples and groundwater. Because ecological risk is usually associated with only the top 6 inches of soil and no contaminant pathway exist pertaining to offsite surface soil, soil was not considered. Groundwater will be discussed later in this assessment, but no potential exposure pathway has ever been sampled. The potential exist that offsite agriculture wells may complete the pathway and will be discussed. For the purposes of the ERA, the USEPA's Region IV Supplemental Guidance to RAGS Bulletins and the Office of Solid Waste and Emergency Response (OSWER) sediment screening values were used to select potential ECPCs.

To identify chemicals that may pose a risk to the environment, the ERA used only the results from surficial sediment samples (0 to 6 inches bgs). It is presumed, even considering root development in the lower strata, that most biological effects are limited to this upper zone. In sediment, analytes were selected as an ECPC if the maximum concentration detected either: (1) exceeded the USEPA Region IV Sediment Screening Value and/or OSWER Values, (2) exceeded the most conservative effects level found in literature, or (3) if neither of these benchmarks were available.

3.4 Chemicals in Sediments

To present sediment conditions at Area I, the range of concentrations detected in sediments, the total number of samples analyzed (N), the number of detections, the minimum and maximum concentration for each parameter, the EPA Sediment Screening Value (SSV) and the ECPCs retained for consideration in the area-specific risk assessment are tabulated below.

3.5 Contaminants of Concern

To be conservative ecological risk evaluations assume exposure to the maximum concentrations for each detected contaminant of concern.

In Area I all chemicals were designated as ECPC because maximum concentrations exceeded the sediment screening values.

In the Area II wetland, no sample data was collected because no exposure pathway between the suspected source and the wetland was identified.

Area III, sample data consist of subsurface soil and groundwater data only, therefore risk to terrestrial receptors could not be assessed. No ecological benchmarks exist for contaminated ground water and ecological receptors are unlikely to be exposed to subsurface soil.

Cedar Chemical
Ditch Sediment Concentrations

Parameter	N	Detections	Range	SSV	Value	OSWER Type[e]	ECPC
METALS (ppm)							
Arsenic	12	1	20	7.24	8.2	ER-L	Yes

Cedar Chemical
Ditch Sediment Concentrations

Parameter	N	Detections	Range	SSV	Value	OSWER Type[e]	ECPC
PESTICIDES (ppb)							
Aldrin	12	4	2.8 - 58	—	—	—	Yes
Dieldrin	12	4	5.6 - 550	3.3	52	SQC	Yes
4,4'-DDE	12	6	2 - 78	3.3	—	—	Yes
4,4'-DDD	12	9	7.6 - 180	3.3	—	—	Yes
4,4'-DDT	12	2	15 - 91	3.3	—	—	Yes
Endrin	12	2	76 - 89	3.3	20	SQC	Yes
gamma-BHC	12	1	18	3.3	3.7	SQB	Yes
Methoxy-chlor	12	6	130 - 2500	—	19	SQB	Yes
Toxaphene	12	1	1600	—	28	SQB	Yes

Notes:
N = Number of samples
SSV = USEPA Region 4 Sediment Screening Value
OSWER = USEPA Office of Solid Waste and Emergency Response
ER-L = Effects Range-Low
SQB = Sediment Quality Benchmark
SQC = Sediment Quality Criteria

3.6 Characteristics of ECPCs

Inorganics

Arsenic was detected in one sample at 20 parts per million (ppm), exceeding the SSV of 7.24 ppm. Soil biota appear to be capable of tolerating and metabolizing relatively high concentrations (microbiota to 1,600 ppm) of arsenic (Wang et al., 1984), but adverse effects to aquatic organisms have been reported at concentrations of 19 to 48 parts per billion (ppb) in water. Arsenic soil does not appear to magnify along the aquatic food chain.

Organics

Organochlorine pesticides have been used extensively in the United States since the 1940s and they appear to be ubiquitous in the environment, being found in surface water, sediment, and biological tissues. They are readily absorbed by warm-blooded species and degradatory products are frequently more toxic than the parent form. In soil invertebrates, organochlorine pesticides can accumulate to concentrations higher than those in the surrounding soil, and residues may in turn be ingested by birds and other animals feeding on earthworms (Beyer and Gish, 1980). Most environmental effects studies have been directed at mammals and birds.

3.7 Exposure Pathways and Assessment

In Area I, all chemicals were selected as ECPCs because they either exceeded the sediment screening values or did not have a respective screening value. Two potential pathways were identified. Tadpoles in the ditches are exposed to contaminated sediments. The tadpoles could be bioaccumulating pesticides from exposure to contaminated sediments. Piscivorus birds could also ingest potentially contaminated tadpoles.

In Area II, no potential pathways were identified.

In Area III, the potential pathway from crop irrigation using contaminated groundwater has been identified, since the irrigation wells have not been sampled, no data is available to assess risk.

3.8 Ecological Effects Assessment

A screening-level risk evaluation has been conducted for wildlife potentially living in the Area I ditches. Potential dietary exposure has not been calculated due to lack of amphibian toxicity information from literature searches. A comparison between the sediment concentrations and available SSVs determined potential for any adverse effects.

Although two potential pathways have been identified, in Area I, the predicted ecological risk is less significant since the storm water retention ditches are a component of the waste water treatment system. Storm water collected in the ditches is held until it is needed to treat the facilities's process water discharged into the waste water treatment system. During the summer months 35- 40,000 gallons of water are pumped into the treatment system each day. During dry summer months the reserve storm water is depleted very fast and the ditches remain dry most of the summer. The late spring and early summer time, the ditches hold water for longer periods and are used by opportunistic species such as frogs and wading birds. The ditches are dry until the fall and no longer provide suitable habitat. This short term exposure to opportunistic species presents only marginal risk exposure. Area I is also in the middle of a heavy industrialized area and its discharge was designed to meet NPDES requirements. All treated water from Area I ditches has passed the same biomonitoring test as the effluent discharge from the waste water treatment system. Appendix G contains copies of the most recent biomonitoring report from the effluent discharge and a sample taken from the treatment ponds themselves.

Area II has been excluded from a detailed evaluation based on the fact that no complete pathway exist, through site visits and historical data.

Area III has one potential pathway that consists of contaminated ground water being introduced to the surface by agriculture irrigation wells. Although the potential exist that wildlife could be at risk from contaminated groundwater, it is highly unlikely.

First, the down-gradient agriculture wells have never been sampled and exact chemical concentrations are unknown.

Second, only VOCs have been detected in the further most down gradient monitoring well. If present in the agriculture wells, the contaminant of concern, 1,2-Dichloroethane will most likely

evaporate due to relatively high vapor pressure when released to the land. Releases to the atmosphere will degrade by reaction with hydroxyl radicals. Given the poor degradation characteristics of 1,2-dichloroethane, the primary attenuation mechanisms are evaporation and natural attenuation through advection, diffusion, and dispersion.

Third, no viable habitat is present in Area III. Only a few populations of small mammal and passerine birds species are present. During the hot summer months when irrigations is most frequent, wildlife species are dormant during the heat of the day and seek refuge in wooded areas. Significant wildlife exposure to contaminated groundwater during irrigation events is not anticipated.

4.0 REMEDIAL GOAL OPTIONS

RGOs are site-specific chemical concentrations used by risk managers during the development of remedial alternatives. They are calculated to equate with specific target carcinogenic and noncarcinogenic risk levels. For this HHRA, RGOs were calculated for chemicals having an ILCR greater than 1E-6 or an HQ greater than 1. Those COCs which required calculation of RGOs are listed in Section 2.5.4. Inclusion in the RGO table does not necessarily indicate that remedial action will be required to address a specific chemical. Instead, RGOs are provided to facilitate risk-management decisions.

In accordance with USEPA Region 4 Supplemental Guidance (USEPA, 1995a), RGOs were calculated at 1E-6, 1E-5, and 1E-4 risk levels for carcinogenic COCs and HQ levels of 0.1, 1.0, and 3.0 for noncarcinogenic COCs for all applicable media and receptors using the following equations:

$$RGO_{NCR} = \frac{EPC \times THQ}{Calculated\ HQ}$$

$$RGO_{CR} = \frac{EPC \times TR}{Calculated\ CR}$$

Where:

RGO_{NCR}	=	noncarcinogenic remedial goal option (unitless)
EPC	=	exposure point concentration (mg/kg)
THQ	=	target hazard quotient (0.1, 1, 3) (unitless)
HQ	=	hazard quotient (unitless)
RGO_{CR}	=	carcinogenic remedial goal option (unitless)
TR	=	target carcinogenic risk (1E-06, 1E-05, 1E-04)
CR	=	cancer risk (unitless)

RGOs are presented for sediment, surface and subsurface soil, surface soil, perched groundwater, and alluvial groundwater in the following tables:

Table Number	Site	Media	Receptor
92	1	Sediment	Construction Worker Trespasser
93	2	Surface and Subsurface Soil	Construction Worker
94	3	Subsurface Soil	Construction Worker
95		Surface and Subsurface Soil	Construction Worker
96	9	Surface Soil	Adult Worker Trespasser
96	9	Surface and Subsurface Soil	Construction Worker
97		Perched Groundwater	Construction Worker
98		Alluvial Groundwater	Offsite Agricultural Worker

5.0 CONCLUSIONS AND RECOMMENDATIONS

Alluvial groundwater risks based on RME for the offsite agricultural worker represent the most substantial carcinogenic risks to human receptors contacting contaminated media associated with CCC. Noncarcinogenic risk based on RME for all receptors are substantially high based primarily on construction worker exposures to dinoseb in surface and subsurface soil at Sites 3, 4, and 9.

For ecological receptors potential risk in Area I is considered acceptable because these ditches are integral components of the facility's waste water treatment system. Because of the function of these ditches, standing water is frequently drained and any aquatic habitat is considered opportunistic. The isolated wetland in Area II is not considered at risk because of the exposure pathway is incomplete. Risk to ecological receptors in Area III from exposure to contaminated groundwater from farm irrigation practices is considered minimal based on the lack of receptors and the high volatility of 1,2-dichloroethane.

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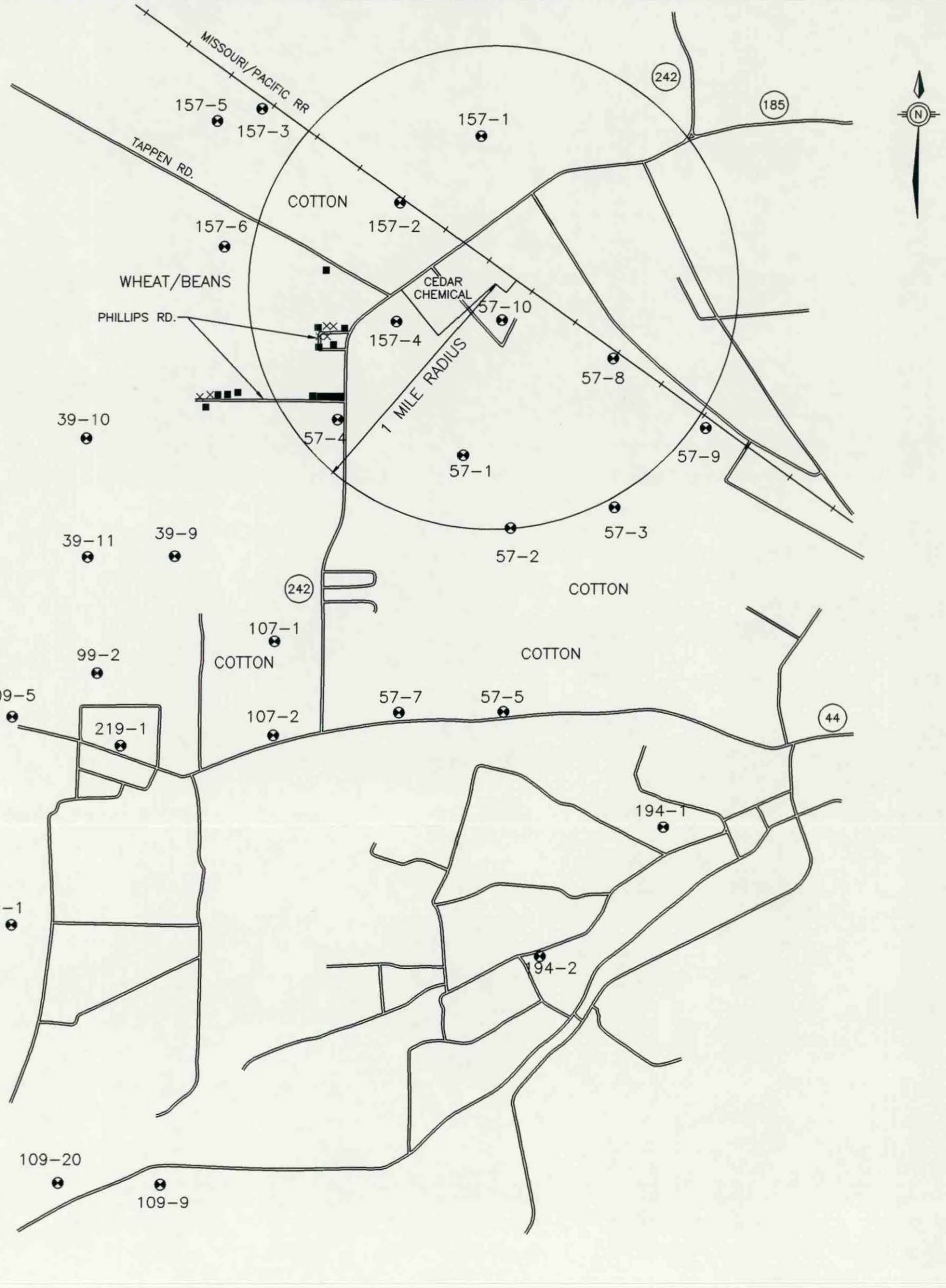

LEGEND

- ⊗ – AGRICULTURAL WELLS
- ■ – RESIDENTS INCLUDED IN WELL SURVEY
- × – RESIDENTS WITH WELLS, NOT IN SURVEY

LOCATIONS ARE APPROXIMATE

ENSAFE
800-588-7962
MEMPHIS, TENNESSEE
CHARLESTON,SC; CINCINNATI,OH; DALLAS,TX; JACKSON,TN; KNOXVILLE,TN; LANCASTER,PA; NASHVILLE,TN; NORFOLK,VA; PADUCAH,KY; PENSACOLA,FL; RALEIGH,NC; COLOGNE, GERMANY

FIGURE 11
AGRICULTURAL AND RESIDENTIAL WELL LOCATIONS
CEDAR CHEMICAL
RISK ASSESSMENT

DWG DATE: 08/30/99 | DWG NAME: 2162S009